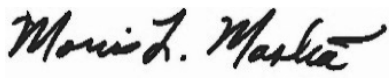
EXHIBIT 6

Rebuttal Response to:

Reports of Alexandros Spiliotopoulos, Remy J.-C. Hennet & Jay Brigham

Prepared by:



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Glossary of Abbreviations and Acronyms

Definitions of terms and abbreviations used throughout this report are listed below.

A

AS Alexander Spiliotopoulos, Ph.D., DOJ Expert

ATSDR Agency for Toxic Substances and Disease Registry; codified under CERCLA, section 104(i), 42 U.S.C. §9604(i); https://atsdr.cdc.gov

B

BTEX Benzene, toluene, ethylbenzene, and xylenes

Bz Benzene

C

CERCLA The Comprehensive Environmental Response, Compensation, and Liability Act of 1980, also known as Superfund

CLW Camp Lejeune Water document

COC Contaminant or chemical of concern

D

DCE 1,1-dichloroethylene or 1,1-dichloroethene

1,2-tDCE *trans*-1,2-dichloroethylene or *trans*-1,2-dichloroethene

DON Department of the Navy

E

EDRP Exposure-Dose Reconstruction Program developed by ATSDR in 1993

EPA U.S. Environmental Protection Agency, https://www.epa.gov, also see USEPA

F

ft Foot or feet

ft^3/d Cubic foot per day

G

Ga. Tech Georgia Institute of Technology, Atlanta, Georgia

g Grams

gpm Gallons per minute

H

HB Holcomb Boulevard

HBWTP Holcomb Boulevard water treatment plant

HP Hadnot Point

HPFF Hadnot Point fuel farm

HPIA Hadnot Point Industrial Area

HPLF Hadnot Point landfill

HPWTP Hadnot Point water treatment plant

I

J

JB Jay L. Bringham, Ph.D., DOJ Expert

L

LCM Linear control model; a model based on linear control theory methodology developed to reconstruct historical contaminant concentrations in water-supply wells

LHS Latin hypercube sampling

M

MODFLOW A family of three-dimensional groundwater-flow models, developed by the U.S. Geological Survey, https://www.usgs.gov/mission-areas/water-resources/science/modflow-and-related-programs

MT3DMS Three-dimensional mass transport, multispecies model developed on behalf of the U.S. Army Engineer Research and Development Center. MT3DMS-5.3 (Zheng and Wang 1999) is the specific version of MT3DMS code used for the Hadnot Point–Holcomb Boulevard study area analyses

MCL Maximum contaminant level

µg/L micrograms per liter; 1 part per billion

Model calibration The process of adjusting model input parameter values until reasonable agreement is achieved between model-predicted outputs or behavior and field observations

N

ND non-detect

NRC National Research Council

P

PCE Tetrachloroethene, tetrachloroethylene, 1,1,2,2-tetrachloroethylene, or perchloroethylene; also known as PERC® or PERK®

PDF Probability density function

R

RH Remmy J.-C. Hennet, Ph.D., DOJ Expert

ROD Record of Decision

S

SCADA Supervisory control and data acquisition

T

TCE 1,1,2-trichloroethene, or 1,1,2-trichloroethylene, or trichloroethylene

TechFlowMP A three-dimensional multispecies, multiphase mass transport model developed by the Multimedia Environmental Simulations Laboratory at the Georgia Institute of Technology, Atlanta, Georgia

TT Tarawa Terrace

TTWTP Tarawa Terrace water treatment plant

U

USMC U.S. Marine Corps

USMCB U.S. Marine Corp Base

UST Underground storage tank

V

VC Vinyl chloride

VOC Volatile organic compound

W

WDS Water-distribution system

WTP Water treatment plant

1.0 Introduction

I am Morris L. Maslia, P.E., a licensed Professional Engineer in the State of Georgia and a consulting engineer retained by the Camp Lejeune Plaintiffs' attorneys. On December 10, 2024, I was provided with electronic copies of the Expert Reports of Alexandros Spiliotopoulos (**AS**), Remy J.-C. Hennet (**RH**), and Jay L. Brigham (**JB**), who have been retained by the U. S. Department of Justice (DOJ). Their Expert Reports evaluate and review the Agency for Toxic Substances and Disease Registry's (ATSDR) water-modeling analyses and historical reconstruction conducted at U.S. Marine Corps Base (USMCB) Camp Lejeune, North Carolina, for the Tarawa Terrace (TT), Hadnot Point (HP), and Holcomb Boulevard (HB) water treatment plants (WTP), water-distribution systems (WDS), and associated service areas.

Purpose of Report

The purpose of this rebuttal report is to respond to certain positions as set out by the DOJ Expert Reports (authored by AS, RH, and JB), dated December 9, 2024 (Spiliotopoulos 2024, Hennet 2024, Brigham 2024). My responses are grouped by major topical areas discussed and presented in the DOJ Expert Reports and listed below (Section 4.0 of this report). This report is organized as follows:

- **Section 1.0:** Introduction
- **Section 2.0:** Purpose of Rebuttal Report
- **Section 3.0:** Agreed Upon Concepts and Facts
- **Section 4.0:** Response to Department of Justice (DOJ) Expert Reports
    - **Section 4.1:** Start Dates for Sources of Contamination
    - **Section 4.2:** Water-Supply Well Operations
    - **Section 4.3:** Volatilization of VOCs During Water Treatment Process
    - **Section 4.4:** Derivation and Computation of Sorption Parameter Values
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    - **Section 4.7:** Graphing and Visualization of Data and Model Results
    - **Section 4.8:** Non-Degraded and Degraded PCE Historical Reconstructions
    - **Section 4.9:** Additional Topics
- **Section 5.0:** Summary and Conclusions
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- **Appendices A:** Volatilization Issues: Excerpts from ATSDR's Expert Panel Meetings, March 28, 2005 and April 30, 2009

3.0 Agreed Upon Concepts and Facts

Prior to providing responses to DOJ Expert Reports (Spiliotopoulos 2024, Hennet 2024, Brigham 2024), I set forth several fundamental concepts that are accepted as scientifically valid approaches and facts that can be agreed upon. These are listed below.

1. The Agency for Toxic Substances and Disease Registry (ATSDR) is a federal, non-regulatory public health agency codified in the Comprehensive Environmental Response, Compensation & Liability Act (CERCLA) of 1980, also known as Superfund (CERCLA 1980); 42 U.S.C. §9604(i).

2. ATSDR, overseen by the U.S. Department of Health and Human Services, is the lead federal public health agency for determining, preventing, and mitigating the human health effects of exposure to hazardous substances. It does this by responding to environmental health emergencies, investigating emerging environmental health threats, conducting research on health impacts of hazardous waste sites (public health assessments, epidemiological studies, and toxicological profiles), and building capabilities and providing actionable guidance to state and local health partners.

3. When data are limited or unavailable, ATSDR conducts exposure-dose reconstruction studies, which can include the use of environmental data, models (air, soil, water, and pharmacokinetic) or biomarkers to estimate and quantify environmental concentrations and exposures to toxic substances.

4. Historical reconstruction is an analysis and diagnostic method used to examine historical characteristics of groundwater flow, contaminant fate and transport, water-distribution systems, air dispersion, and exposure to contaminants (chemical and radiological) when data are limited or unavailable. It is an accepted method of analysis having been applied since the 1930s and described in many peer-reviewed publications (*e.g.*, Costas et al. 2002, Grayman et al. 2004, Konikow and Thompson 1984), Maslia ad Aral 2004, NRC 199), Rodenbeck and Masli,1998, Rogers 1996, Samhel et al. 2010).

5. The mathematical, analytical, and numerical models (e.g., groundwater flow, contaminant fate and transport, and water-distribution system) used by ATSDR are accepted tools and practices among engineers, researchers, and scientists. These models approximate the physics of groundwater flow and contaminant fate and transport, which do not depend on professional judgment. The uncertainty in these models can be reasonably bounded and quantified to provide useful results of chemical exposure (EPA 1998).

6. The rationale and justification for using the historical reconstruction process, including models, at Camp Lejeune is precisely because historical data were limited and not available to ATSDR. As such, the models play an important role in providing insight, information, and quantitative estimates of environmental and exposure concentrations when data are missing, insufficient, or unavailable (Konikow and Thompson 1984, Maslia and Aral 2004).

4.0 Response to Department of Justice (DOJ) Expert Reports

In this section, I present rebuttal responses to DOJ Expert Reports by topical subject matter. The opinions in this report are based on my review of the DOJ Expert Reports, published literature, data

and documents made available to me while consulting on this case (e.g., Plaintiffs' and DOJ's Expert Reports) and my work and analysis during my work on the Camp Lejeune studies as an employee of ATSDR. I have reviewed and am relying upon the rebuttal expert reports of Dr. Leonard F. Konikow, Dr. Norman Jones/Mr. R. Jeffrey Davis, and Dr. David R. Sabatini. I hold the opinions expressed in this report to a reasonable degree of scientific and engineering certainty. I will produce a list of all materials I considered in reaching these opinions within seven days of service of this report. Many of the materials, documents, and data are also listed in the publicly available ATSDR reports on Tarawa Terrace (Maslia et al. 2007) and Hadnot Point-Holcomb Boulevard (Maslia et al. 2013, Appendix A2).

4.1 Start Dates for Sources of Contamination

4.1.1 ABC One-Hour Cleaners

The ATSDR Tarawa Terrace (TT) fate and transport modeling analysis applied a 1,200 gram/day (g/d) tetrachloroethylene (PCE) mass loading rate as the contaminant source at ABC One-Hour Cleaners. ATSDR used a contaminant (source) release date of January 1953. DOJ Experts (AS, RH, and JB) posit that July 1954 is a more appropriate start date for releases of PCE at ABC One-Hour Cleaners (Spiliotopoulos 2024, Section 4.1.2.1; Hennet 2024, Opinion 3; Brigham 2024, Section IV.B). ATSDR relied upon the deposition (sworn testimony) of Victor Melts (owner of ABC One-Hour Cleaners) who testified on April 12, 2001 that he started ABC One-Hour Cleaners in 1953 and that he operated the company in the same location since 1953 (Melts 2001, p.6–7)[1]. Additionally, in remedial investigation reports of the ABC One-Hour Cleaners site by Roy F. Weston, Inc. (1992, 1994)[2] a specific date for start of operations is not provided; rather, these documents indicate that ABC One-Hour Cleaners is a North Carolina corporation registered with the Secretary of State as of March 4, 1958. The U.S. Environmental Protection Agency's (EPA) Record of Decision (ROD) for the ABC One-Hour Cleaners Site (Section 2.1 Facility Operations and History) [3] also does not provide a specific date for start of operations—it also indicates that ABC One-Hour Cleaners is a North Carolina corporation registered with the Secretary of State as of March 4, 1958. Without documented information and data as to the specific date for start of operations at ABC One-Hour Cleaners, ATSDR relied upon the sworn testimony of Victor Melts (Melts 2001, p. 6-7).

To test the effect of varying the start date for operations at ABC One-Hour Cleaners on reconstructed PCE concentrations, Plaintiffs' experts conducted a sensitivity analysis using the calibrated (and published) ATSDR Tarawa Terrace MODFLOW and MT3DMS input files (Maslia et al., 2007, provided on DVD). The sensitivity analysis consists of applying the following start date of operations (source release dates) at ABC One-Hour Cleaners:

- January 1953 (ATSDR calibrated model start date used in Faye 2008)
- January 1954 (+1 year from calibrated model start date)
- July 1954 (+1.5 years from calibrated model start date posited by DOJ Experts AS, RH, and JB)

[1] CLJA document 00897_PLG_0000067569 – 00897_PLG_0000067570.
[2] CLJA_WATERMODELING_09-0000083841; CLJA_WATERMODELING_09-0000084255.
[3] CLJA_EPA01-0000383135 – CLJA_EPA01-0000383136.

- January 1955 (+2 years from the calibrated model start date)

Results of varying the start dates of operations at ABC One-Hour Cleaners (source release date) are shown in Figures 4.1A and 4.1B for reconstructed PCE concentrations at water-supply well TT-26 and the Tarawa Terrace water treatment plant (TTWTP), respectively. These results show that the calibrated TT modeled PCE concentrations are insensitive to these variations in source release date throughout much of the exposure period since these variations make a negligible difference in PCE concentrations from the calibrated reconstructed concentrations for the duration of the epidemiological study (1968-1985)[4], as listed in Table 4.1. Additionally, the dates that the maximum contaminant level (MCL) for PCE of 5 ug/L is exceeded at water-supply well TT-26 and at the TTWTP, the duration of exceedance (in months), and the maximum reconstructed concentrations are listed in Table 4.2. Note the negligible changes from the calibrated ATSDR model results due to the variable start dates (Maslia et al. 2007; Faye 2008). Based on this sensitivity analysis, I conclude that the ATSDR calibrated models for reconstructing PCE concentrations are not sensitive to the start date of operations (source release date) at ABC One-Hour Cleaners. I stand by the ATSDR start of operations at ABC One-Hour Cleaners of January 1953, as documented in the sworn testimony of Victor Melts (2001) and applied by Faye (2008) as a more reliable start date.[5]

[4] Reconstructed concentrations are shown for the start of the epidemiological study of January 1968 and the last in-service date of TT-26.

[5] The evidence for ABC One-Hour Cleaners opening in 1954 as presented by Dr. Jay Brigham is circumstantial. Advertisements are subject to a lag in publication so that they may come out well after things have changed on the ground. Similarly, grand openings often occur well after a business has opened, when operations are more fully established. The sworn testimony of Mr. Melts is more reliable than the information provided by Dr. Brigham.

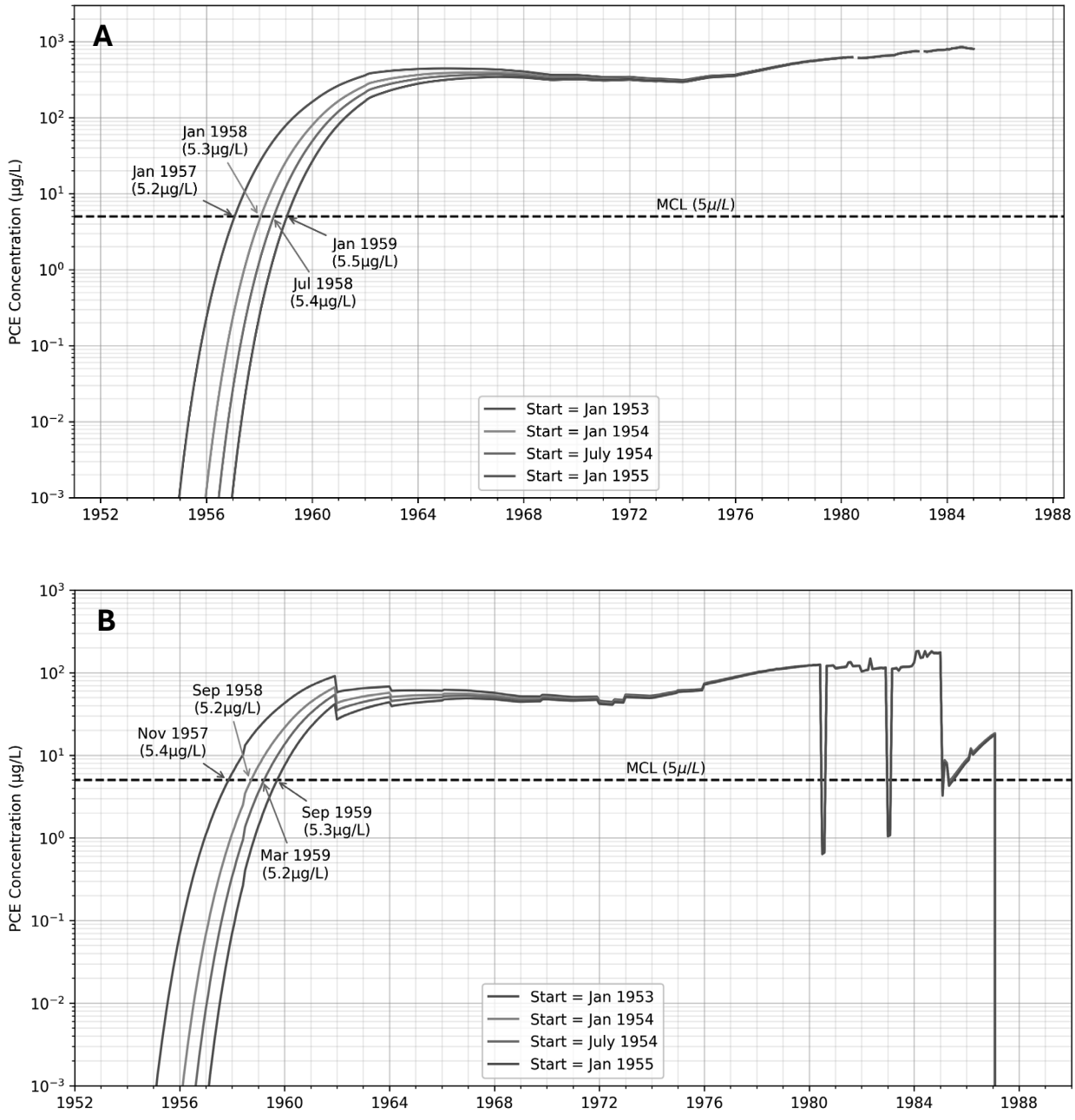


Figure 4.1. Plot of Modeled Concentration of tetrachloroethylene (PCE) with source release date variation: A, water-supply well TT-26 and B, Tarawa Terrace water treatment plant (TTWTP)

Table 4.1. Reconstructed PCE concentrations for variations in source release date at water-supply well TT-26 and the Tarawa Terrace water treatment plant (TTWTP)[+]

[µg/L, micrograms per liter, PCE, tetrachloroethylene]

Date[*]	January 1953[+]	January 1954	July 1954	January 1955
Water-supply well TT-26				
January 1968	402	373	356	336
January 1985	804	802	801	800
Tarawa Terrace water treatment plant (TTWTP)				
January 1968	57	53	51	48
January 1985	176	176	175	175

[+]Using calibrated ATSDR model parameter values and published model input files (Maslia et al. 2007)

[*]January 1968 is start of ATSDR's epidemiological study; January 1985 is last operating month for well TT-26

Table 4.2. Date reconstructed PCE concentration exceeds the MCL (5 µg/L), duration of exceedance, and date of maximum concentration for variations in source release date, at water-supply well TT-26 and at Tarawa Terrace water treatment plant (TTWTP)[+]

[MCL, maximum contaminant level; µg/L, micrograms per liter; PCE, tetrachloroethylene]

Source release date	Date exceeding MCL (5 µg/L)	Duration exceeding MCL, in months	Maximum PCE, in µg/L (date of occurrence)
Water-supply well TT-26			
Jan 1953[+]	Jan 1957	361	851 (Jul 1984)
Jan 1954	Jan 1958	349	849 (Jul 1984)
Jul 1954	Jul 1958	343	849 (Jul 1984)
Jan1955	Jan 1959	337	847 (Jul 1984)
Tarawa Terrace water treatment plant (TTWTP)			
Jan 1953[+]	Nov 1957	351	183 (Feb 1984)
Jan 1954	Sept 1958	341	183 (Feb 1984)
Jul 1954	Mar 1959	335	182 (Feb 1984)
Jan1955	Sept 1959	329	182 (Feb 1984)

[+]Using calibrated ATSDR model parameter values and published model input files (Maslia et al. 2007)

4.1.2 Hadnot Point Industrial Area and Landfill

In Section 4.2.3.2 (Spiliotopoulos, 2024, pp. 78-79), AS notes that ATSDR recognizes the lack of explicit data defining source locations and mass loadings but criticizes ATSDR for "arbitrarily assigning these quantities to the model to fit the limited water-quality data available starting in 1982." However, AS's critique goes to the heart of the model calibration, history matching, and parameter estimation processes used in groundwater modeling. In these processes, parameter values are adjusted (either manually or automatically) to improve the fit (Hill and Tiedeman, 2007).

Furthermore, ATSDR conducted meticulous and detailed source characterization analyses, as documented in Maslia et al. (2013, Tables A6, A7, and A8). Table A8, shown below as Table 4.3 of this report, provides specific information relevant to documented source areas, timelines, primary contaminants, and locations of major dissolved sources for the HPIA and HPLF areas.

Table 4.3. Maslia et al. (2013), Table 8.

Table A8. Identification of documented source areas, timelines, primary contaminants, and location of major dissolved-phase sources, Hadnot Point–Holcomb Boulevard study area, U.S. Marine Corps Base Camp Lejeune, North Carolina.

[HPFF, Hadnot Point fuel farm; UST, underground storage tank; AS/SVE; air sparging/soil vapor extraction; MW, monitor well; µg/L, microgram per liter; gal, gallon; LUST, leaking underground storage tank; CERCLA, Comprehensive Environmental Response, Compensation, and Liability Act of 1980; TCE, trichloroethylene; PCE, tetrachloroethylene]

[1]Source-area timeline [reference documents]	Primary contaminant; number of major sources	Location of major dissolved-phase sources
Hadnot Point Industrial Area (see Figure A13)		
Hadnot Point fuel farm events **1941**, HPFF USTs installed [UST #669, UST #670] **1942**, Building 1115 USTs installed [UST #670] **1993 January**, HPFF and Building 1115 USTs removed [UST #1186, UST #670] **2000 December**, Piping removal (extensive) at HPFF/Building 1115 [UST #417] **Building 1613 events** **1950s**, USTs installed [UST #548, UST #546] **1995 January**, USTs and contaminated soil removed [UST #535, UST #548] **1998–2004**, AS/SVE remediation system operated **Building 1601 events** **1940s**, Building 1601 built [UST #172, UST #195] UST removal date unknown	Benzene; three sources	HPFF/Building 1115/Building 1101 free product footprint Building 1613 free product footprint Building 1601 locations of maximum measured benzene in groundwater (78-GW75-1 and 78-GW74) and former location of USTs and dispenser island at southeast corner of building; MW 78-GW75-1 (5,500 µg/L in 2003; 3,200 µg/L in 2004); MW 78-GW74 (3,200 µg/L in 2004) (See Figure A9 for building and monitor well [MW] locations)
Building 1601 events **1940s**, Building 1601 built [UST #172, UST #195] **1942**, 1,500-gal UST install date listed in LUST study completed in 1990 by Geraghty and Miller [UST #504, UST #507] **1993 June 29**, UST excavated/removed [UST #624] **Building 901/902/903 events** **1948**, Buildings 900, 901, 902, 903 constructed [CERCLA #258, p. 149] TCE UST installation date unknown; removal/abandonment date unknown, but probably occurred prior to onset of remediation efforts around January 1995 [Sovereign Consulting, Inc. 2007]	TCE; two sources	Building 1601 locations of maximum measured TCE in groundwater (MW 78-GW09-1 (old) and (new)) and former location of 1,500-gal waste UST on north side of building; MW 78-GW09-1 (old) (5,000–14,000 µg/L during 1987–1991); MW 78-GW09-1 (new) (at/above 1,000 µg/L during 1993–1996) Building 901/902/903 locations of max measured TCE in groundwater (MW 78-GW23; 13,000 µg/L in 1987), maximum measured vinyl chloride in groundwater (MW 78-GW44; 1,600–6,700 µg/L during 2000–2004), and former locations of USTs containing TCE/solvent waste at Building 901 and between Buildings 902/903. (See Figure A9 for building and monitor well [MW] locations)
Hadnot Point landfill area (see Figure A14)		
Landfill **1940s**, reportedly used as a waste disposal area (Site 6 and Site 82; Figure A8) beginning in the 1940s	PCE and TCE; one source	Location of maximum measured concentration of TCE and PCE in groundwater (MW 06-GW01D) TCE ranged from 6,400 to 180,000 µg/L during 1992–2004; PCE ranged from 210 to 6,500 µg/L during 1992–2004 (See Figure A10 for monitor well [MW] locations)

[1] UST # refers to UST Web Management Portal file number (see References section of this report for complete details); CERCLA # refers to CERCLA Administrative Record file number (provided on digital video disc [DVD] in Maslia et al. 2007)

ATSDR does indeed discuss the lack of data to define the source loading terms for the model in the Hadnot Point Industrial Area (HPIA) and Hadnot Point landfill (HPLF) areas. However, as Dr. Konikow (2025) notes and I agree, there is no doubt that these chemical contaminants (including TCE and PCE) were present in the groundwater at toxic concentrations (substantially exceeding the MCLs[6]) in these areas, and that they were pumped out of the aquifer by several operating water-supply wells shown in Maslia et al. (2013, Figures A9 and A10) and provided below as Figures 4.2 and 4.3.

In AS's summary for his Opinion 14 (Spiliotopoulos, 2024, p. 79), ATSDR is criticized for having "assumed constant mass loading of the same magnitude at all sources for more than 40 years," which he believes is "highly uncertain, if not impossible." I disagree. ATSDR applied an average rate over the critical period because there was no basis for determining how the loading might have varied over time. This approach aligns with accepted groundwater flow and contaminant fate and transport modeling best practices. The fact that the model with a constant mass loading adequately reproduced observed concentrations supports ATSDR's method for modeling the sources at Hadnot Point Industrial Area and Hadnot Point landfill. (Konikow 2025)

Finally, ATSDR reviewed an EPA study (USEPA 1986, 1986) of 12,444 leak incident reports to estimate the timing of UST releases at Hadnot Point. This is certainly not "arbitrary and uncertain." Reliance upon such a comprehensive study is an accepted methodology; it is not "arbitrary." In summary, ATSDR based parameter values on the best data it had available, including site-specific and published data. ATSDR also made appropriate adjustments to parameters to fit site-specific conditions.

[6] MCL, maximum contaminant level; 5 μg/L for PCE and 5 μg/L for TCE.

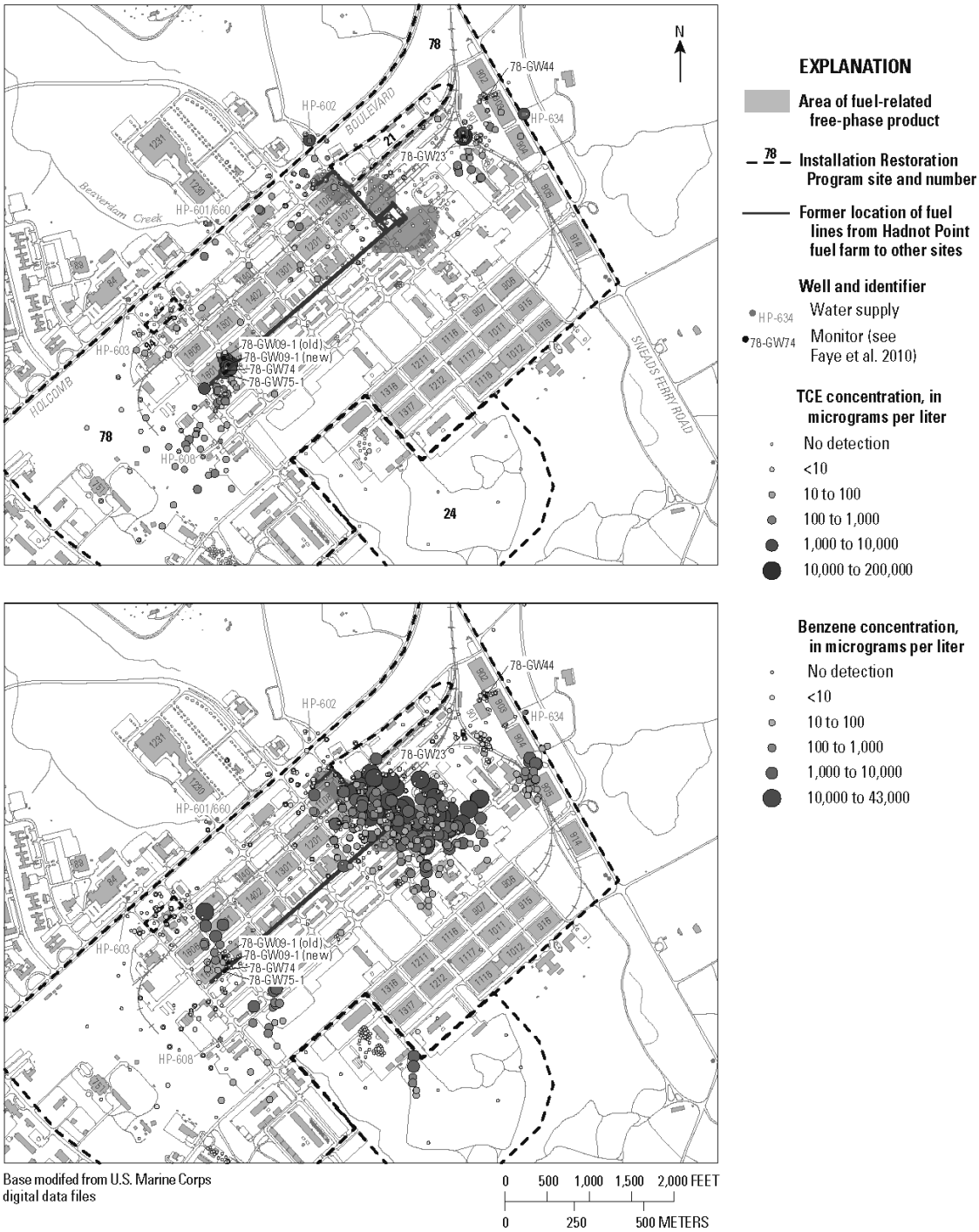


Figure A9. Sampling data for trichloroethylene (TCE), benzene, and fuel-related free product in groundwater for the Hadnot Point Industrial Area, Hadnot Point–Holcomb Boulevard study area, U.S. Marine Corps Base Camp Lejeune, North Carolina. (See Figure A8 for location and Figure A13 for selected building numbers.)

Figure 4.2. From Maslia et al. (2013), Figure A9

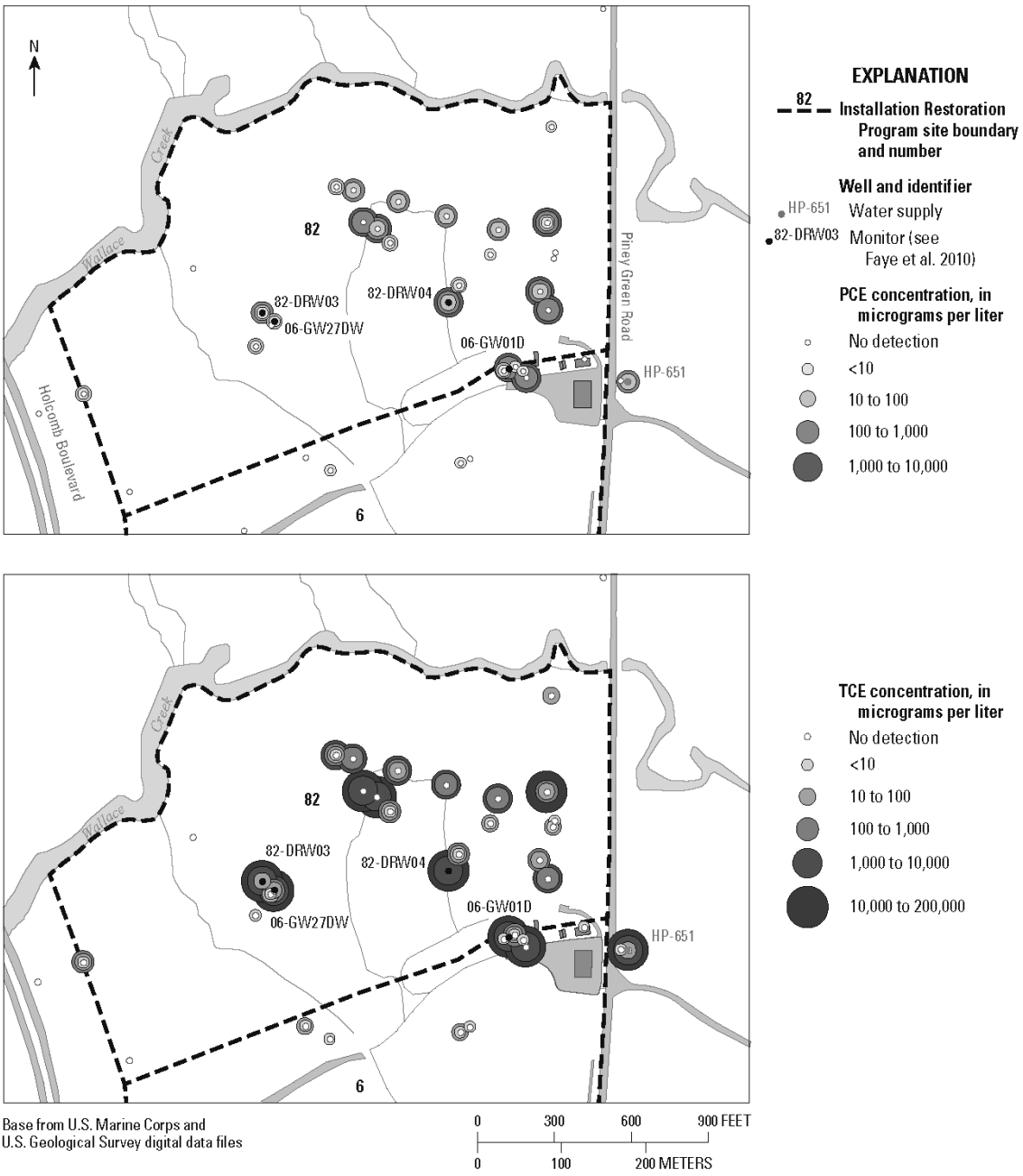


Figure A10. Sampling data for tetrachloroethylene (PCE) and trichloroethylene (TCE) in groundwater for the Hadnot Point landfill area, Hadnot Point–Holcomb Boulevard study area, U.S. Marine Corps Base Camp Lejeune, North Carolina. (See Figure A8 for location.)

Figure 4.3. From Maslia et al. (2013), Figure A10

4.2 Water-Supply Well Operations

4.2.1 Tarawa Terrace

In his opinion 5, Spiliotopoulos (2024, Section 4.1.2.6) posits that the ATSDR groundwater model for TT resulted in "biased-high estimates of monthly contaminant concentrations" at water supply well TT-23. (his Section 4.1.2.6). I concur with Dr. Konikow's assessment of opinion 5:

> Section 4.1.2.6 (p. 42) offers no clear evidence that the discrepancy at this one well (out of many) has a substantial impact on the overall results. Based on ATSDR Table E2, of the nine unique sampling dates for this well, six had an observed level of PCE or TCE above the MCL. Furthermore, with respect to the overall effect on concentrations estimated at the WTPs, it is important to note that TT-23 was operational for only about 9 months or less, starting in 1984, and had the shortest operational (pumping) period of any of the 16 pumping wells operating in the TT area (see Table H3 in Chapter H of the TT series of reports). When it was pumping, the contribution from this well provided only a small fraction of the total groundwater inflow to the WTP with concentrations far less than well TT-26 (with its modeled concentrations likely being underestimated). Thus, if indeed the estimates for this well were too high (by less than two times), the effect on calculated concentrations in the WTP would be minimal both in magnitude and in duration.
>
> (Konikow 2025).

With respect to calibrated ATSDR models being "biased high" as posited by DOJ experts, the opposite is true. For example, Figure 4.4 from Faye (2008, Figure F16)[7] shows a plot of observed data (5 of the 6 samples were obtained within a week's time) and reconstructed PCE concentrations for water-supply well TT-26. Note that the highest and first sample was taken during the period when this well was in service, as compared to the remaining samples when this well was out of service. If anything, it could be argued that the model is under-predicting the concentrations. Furthermore, note that reconstructed PCE concentrations fell almost exactly at the midpoint of the range of observed values (about 800 ug/L)—countering the claim of being biased high and confirming the adequateness and acceptability of the calibrated ATSDR models including the reconstructed supply-well operations. As with well TT-23 discussed above, the first sample from well TT-26 was taken when it was operating, and the remainder of the samples were taken after well TT-26 was permanently removed from service.

[7] CLJA_WATERMODELING_01-0000488379.

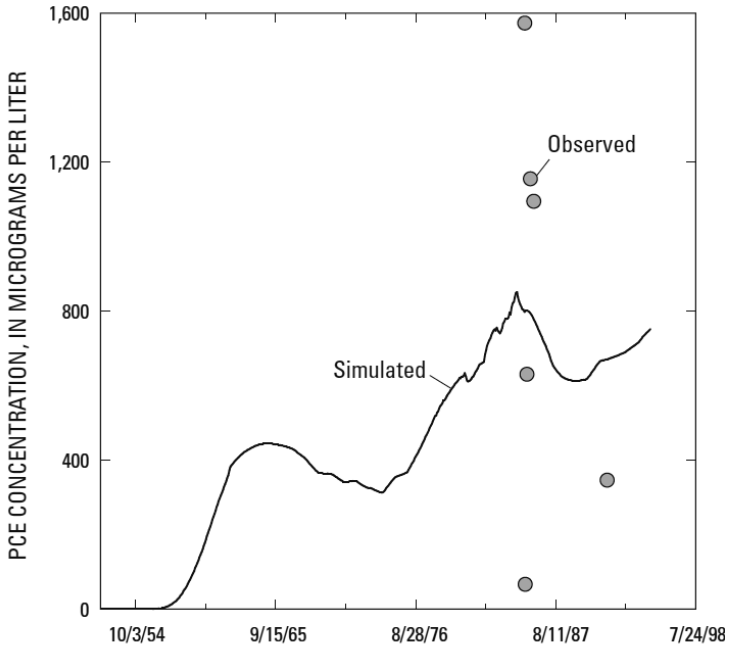


Figure F16. Simulated and observed tetrachloroethylene (PCE) concentrations at water-supply well TT-26, Tarawa Terrace, U.S. Marine Corps Base Camp Lejeune, North Carolina, January 1952–December 1994 (see Figure F6 for location).

Figure 4.4. From Faye (2008), Figure F16.

4.2.2 Hadnot Point

In Section 4.2.2 (Spiliotopoulos, 2024, p. 72), the claim is made that ATSDR "made arbitrary assumptions to reconstruct pumping history…" I agree with Dr. Konikow who, after reviewing the ATSDR's historical reconstruction, concluded:

> In my opinion, the assumptions were not arbitrary, but rather were well-informed, well-reasoned, and carefully documented. Assumptions had to be made about the pumping history, and they were made, but they were not arbitrary. For example, Dr. Spiliotopoulos notes that "Yearly volumes are available for some years prior to 1980. A trendline was used to estimate raw-water flows for years prior to 1980 when no data exist." This appears to be a sound statistical approach, and the use of a trend line is certainly not arbitrary.
>
> In Section 4.2.2 (p. 72-73) Dr. Spiliotopoulos offers a further criticism that "it was assumed that a well would be operated in the historical period based on a pattern similar to the more recent 'training period,' with further adjustments to account for information on the varying capacity of wells, where available." Dr. Spiliotopoulos' statement actually

contradicts his assertion that estimates were arbitrary. Here he describes a reasoned and reasonable approach to estimating a pattern of past water use (well pumpage)—an approach that is not "arbitrary."

In several additional paragraphs on p. 73 (as well as elsewhere), he repeats the claim that pumping rates were based on arbitrary assumptions. ATSDR uses sound statistical methods (such as regression and correlation) to estimate pumpage. This is neither arbitrary nor unreasonable."

(Konikow 2025)

ATSDR developed and applied a sophisticated and novel pumping schedule algorithm for the nearly 100 water-supply wells serving Hadnot Point and Holcomb Boulevard. They did this by using a "training period" when pumping data are known (typically, present-day) and a "predictive period" when pumping data were unknown. Details of this methodology are provided in Telci et al. (2013)[8] and are the basis for the pumping schedules assigned to wells supplying the HP-HB service areas. Similar wells managed by the same operating authority (e.g., the Camp Lejeune Water Utilities Department) are likely to have been operated in a similar manner—however, in the early years of operations they simply were not required to maintain as detailed records (e.g., SCADA data) as would be expected today. AS does not offer a better or more reasonable approach than the one used by ATSDR.

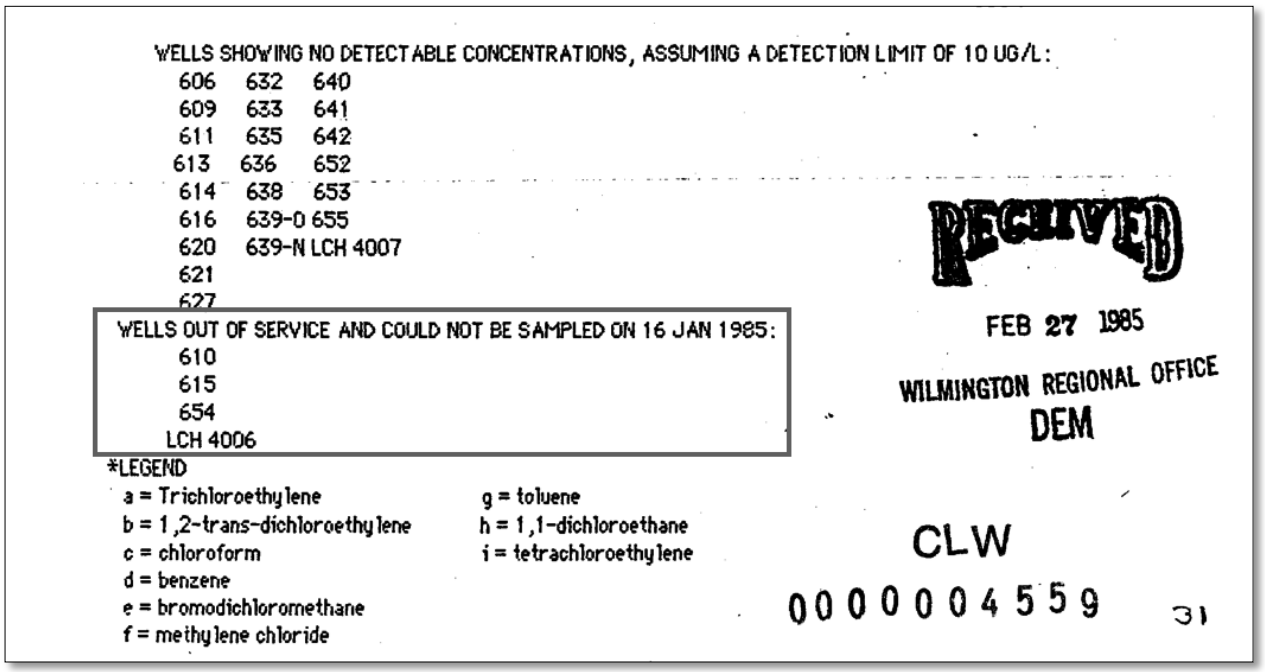
4.2.2.1 HP-634

In Section 4.2.3 (Spiliotopoulos 2024, p. 77), AS states that model calibration was "improperly influenced" by "erroneous concentrations reported for well HP-634 … while non-detections were ignored." Documentation and discussion below provide evidence that the concentration in well HP-634 (sampled on 1/16/1985) of 1,300 µg/L of TCE was not an erroneous concentration. Furthermore, non-detections were not ignored. They are clearly listed and labelled in many tables presented in the ATSDR reports (e.g., Maslia et al. 2013, Table A4) and in many other places in ATSDR reports (Faye et al. 2008; Faye et al. 2012).

There are certain documents that show that well HP- 634 was (temporarily) shut down on 12/10/84 when methylene chloride was found in the sample; however, the documents below demonstrate that well HP-634 was operating until early February 1985.

The first document is cited in RH's footnote 111 (Hennet 2024, p. 5-31, footnote 111).[9] In the callout of the wells out of service on 1/16/1985, HP-634 is not among those listed, suggesting that the well was still in service on this date. January 16th is when the 1,300 µg/L sample was taken at HP-634.

[8] CLJA_WATERMODELING_05-00001005675 – 05_00001005810.
[9] CLJA_CLW00000004559



WELLS SHOWING NO DETECTABLE CONCENTRATIONS, ASSUMING A DETECTION LIMIT OF 10 UG/L:

606 632 640
609 633 641
611 635 642
613 636 652
614 638 653
616 639-0 655
620 639-N LCH 4007
621
627

WELLS OUT OF SERVICE AND COULD NOT BE SAMPLED ON 16 JAN 1985:

610
615
654
LCH 4006

*LEGEND

a = Trichloroethylene
b = 1,2-trans-dichloroethylene
c = chloroform
d = benzene
e = bromodichloromethane
f = methylene chloride
g = toluene
h = 1,1-dichloroethane
i = tetrachloroethylene

RECEIVED
FEB 27 1985
WILMINGTON REGIONAL OFFICE
DEM

CLW

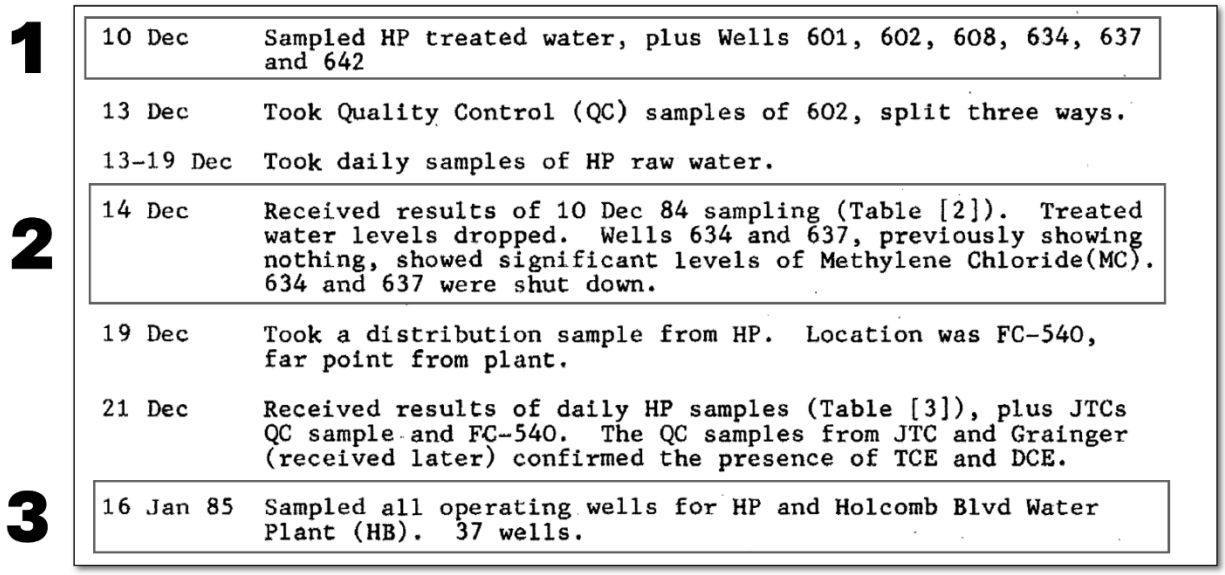
0000004559 31

- **Event #1:** Well HP-634 is tested with other wells on 12/10/1984.

- **Event #2:** Test samples from 12/10/84 are back with "Wells 634 and 637, previously showing nothing, showed significant levels of Methylene Chloride (MC). 634 and 637 were shut down."

- **Event #3:** This is a key statement: On Jan. 16, 1985, "Sampled all operating wells for HP and Holcomb Blvd Water Plant (HB). 37 wells". The key being all **operating** wells.

Further documentation that supports the fact that HP-634 was operating on 1/16/1985 when the sample was taken is provided in CLW4546,[10] which is a chronological listing of events from 11/30/1984 to 2/25/1985. A portion of that document covering 12/10/84 to 1/16/85 is shown below.



1	10 Dec	Sampled HP treated water, plus Wells 601, 602, 608, 634, 637 and 642
	13 Dec	Took Quality Control (QC) samples of 602, split three ways.
	13-19 Dec	Took daily samples of HP raw water.
2	14 Dec	Received results of 10 Dec 84 sampling (Table [2]). Treated water levels dropped. Wells 634 and 637, previously showing nothing, showed significant levels of Methylene Chloride(MC). 634 and 637 were shut down.
	19 Dec	Took a distribution sample from HP. Location was FC-540, far point from plant.
	21 Dec	Received results of daily HP samples (Table [3]), plus JTCs QC sample and FC-540. The QC samples from JTC and Grainger (received later) confirmed the presence of TCE and DCE.
3	16 Jan 85	Sampled all operating wells for HP and Holcomb Blvd Water Plant (HB). 37 wells.

On page 6 of the same document (Table [5])[11] the 37 wells tested on 1/16/85 are listed and HP-634 is on the list, and shows a sampled concentration for TCE of 1,300 µg/L.

Table [5]

LAB: JTC Sampled: 16 January 1985 Detection Limit: 10ppb

	Well	DCE	TCE	PCE	VC	11D
1	601	8.8	26	ND	ND	ND
2	634	700	1300	10	6.8	ND
3	651	3400	3200	386	655	187
4	652	ND	9.0	ND	ND	ND
5	653	ND	5.5	ND	ND	ND

None Dectected:

6 603	16 632	26 642	
7 606	17 633	27 643	
8 609	18 635	28 644	
9 611	19 636	29 646	
10 613	20 637	30 647	
11 614	21 638	31 648	
12 616	22 639(OLD)	32 650	
13 620	23 639(NEW)	33 655	
14 621	24 640	34 LCH 4007	
15 627	25 641		

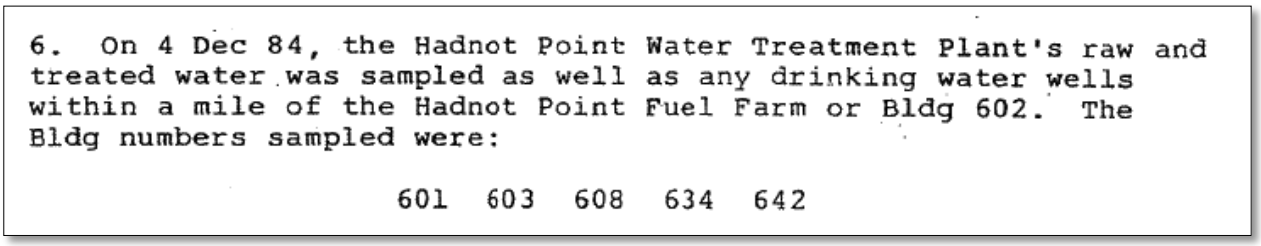
Broken Samples: 35 602, 36 608, 37 645, 651

See Note 3.

[11] CLJA_WATERMODELING_09-0000424938

Further support for the fact that HP-634 was only temporarily closed comes from an email dated 4/11/1989 (Bates CLJ16100/CLW1818) from the Supervisory Chemist to the Director of the Natural Resources and Environmental Affairs Division with the subject "WATER MONITORING RELATED TO THE INSTALLATION RESTORATION (IR) PROGRAM".

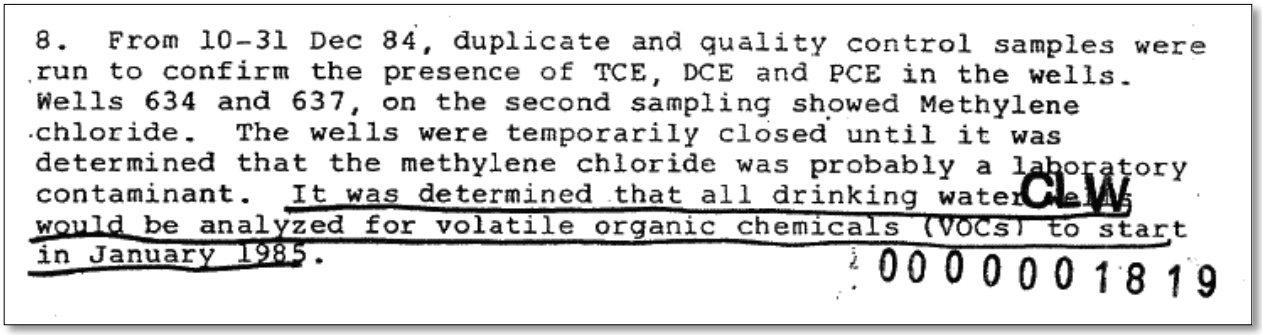
On page 2 of the document (CLJ161101/CLW1819) bullet 6 states certain wells were tested on 12/4/1984 including HP-634:



6. On 4 Dec 84, the Hadnot Point Water Treatment Plant's raw and treated water was sampled as well as any drinking water wells within a mile of the Hadnot Point Fuel Farm or Bldg 602. The Bldg numbers sampled were:

601 603 608 634 642

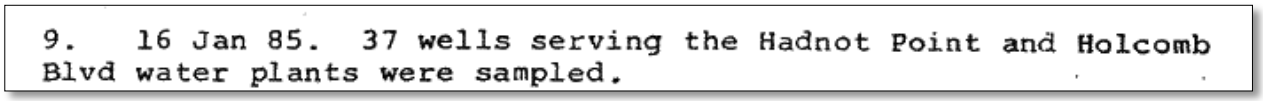
Bullet 8 on the same page states that methylene chloride was found in wells 634 and 637 during a 2nd sampling on 12/10/1984. "The wells were temporarily closed until it was determined that the methylene chloride was probably a laboratory contaminant."



8. From 10-31 Dec 84, duplicate and quality control samples were run to confirm the presence of TCE, DCE and PCE in the wells. Wells 634 and 637, on the second sampling showed Methylene chloride. The wells were temporarily closed until it was determined that the methylene chloride was probably a laboratory contaminant. It was determined that all drinking water wells would be analyzed for volatile organic chemicals (VOCs) to start in January 1985.

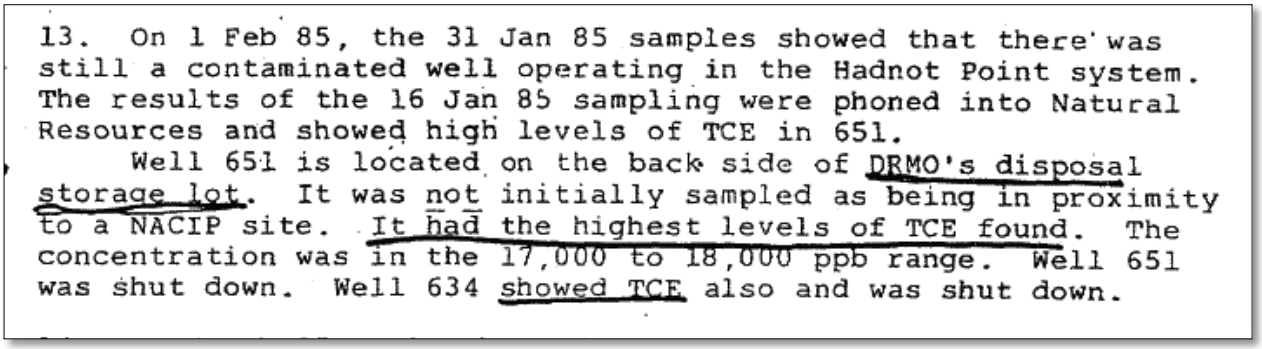
CLW 0000001819

Bullet 9 (CLJ611102/CLW1820) states 37 wells serving HP and HB were tested on 1/16/1985.



9. 16 Jan 85. 37 wells serving the Hadnot Point and Holcomb Blvd water plants were sampled.

Bullet 13 on the same page states “On 1 Feb 85, the 31 Jan 85 samples showed that there was still a contaminated well operating in the Hadnot Point system. The results of the 16 Jan 85 sampling were phoned into Natural Resources and showed high levels of TCE in 651.” At the end of the bullet text it states, “Well 634 showed TCE also and was shut down”.



13. On 1 Feb 85, the 31 Jan 85 samples showed that there was still a contaminated well operating in the Hadnot Point system. The results of the 16 Jan 85 sampling were phoned into Natural Resources and showed high levels of TCE in 651.

Well 651 is located on the back side of DRMO's disposal storage lot. It was not initially sampled as being in proximity to a NACIP site. It had the highest levels of TCE found. The concentration was in the 17,000 to 18,000 ppb range. Well 651 was shut down. Well 634 showed TCE also and was shut down.

This statement supports the facts that HP-634 was “temporarily closed”, as stated in bullet 8, and that the well was shut down for TCE - not methylene chloride.

Therefore, based on the documentation regarding water-supply well HP-634, the claims made by the DOJ Experts (Spiliotopoulos 2024, Hennet 2024) are incorrect. HP-634 was operating on the date it was sampled on Jan. 16, 1985; the result was 1,300 µg/L of TCE; and the well was shut down due to this high TCE concentration.

4.2.2.2 HP-651

RH (Hennet 2024, p. 5-28 and 5-29) posits that well data covering 11/28/1984 to 2/5/1985 (CLJA_CLW00000006590 – 6593) should be used as the basis for determining HP-651’s contribution to the HPWTP finished water concentrations from 1972 to 1985. The paragraph below summarizes RH’s position:

> “The average concentration measured for TCE in HP-WTP over the period January 21 to February 5, 1985,99 is 582 ug/L. During this period it is known that HP-651 was being pumped (RH, p. 4-19, Exhibit I-9). Considering that HP-651 was being pumped 39% of the time (0.39 frequency of pumping; Exhibit I-9) yields a TCE long-time average concentration of 227 ug/L for HP-WTP supplied water.
>
> 0.39 x 582 (ug/L) = 227 (ug/L).”

RH presents a table that represents the data in CLJA_CLW00000006590 – 6593 in an Excel™ spreadsheet. Using these data he determines that over the 69 days covered, well HP-651 only was operating 39% of the time so this is the value that should be used over the entire life of well HP-651, which is from 7/72 to 2/85 or 12.6 years. In doing so RH either fails to realize or does not disclose that these two months of well operation from 11/28/1984 to 2/7/1985 are anything but ordinary and therefore, should not be used as the basis for any long-term forecasting of pumping schedules. Below I discuss the reasons why the 69-day period selected by RH is not reliable and should be disregarded.

- **Point 1:**

The 11/28/1984 to 2/5/1985 period should be broken into months and not as a 69-day pumping period. The ATSDR pumping schedules are based on months as their base unit. If this is done for well HP-651 the results for days of operations and percentage of time operating are as listed in Table 4.4.

Table 4.4. Monthly pumping schedule for well HP-651, December 1984 – and January 1985.

Month	Days of Operation	Percentage on
December 1984	2	6%
January 1985	18	58%

These results should make the modeler question whether there is an explanation for the HP-651's low operation in December. The most logical explanation involves wells New 623, New 622, New 629, New 661 and New 662. These 5 wells were new wells brought online from 6/1984 to 10/1984 and represent over 1,200 (gallons per minute (gpm) of combined capacity. The frequency with which they were in operation ranged from a low of 61% to a high of 94% (Table 4.5). Certainly, the addition of these 5 new wells had an effect on the pumping schedule at HPWTP.

Table 4.5. Characteristics of New Hadnot Point Wells, June–October 1984.

[DOB, construction completion date; gpm, gallons per minute; HP, Hadnot Point; %, percent]

HP Well ID	Other Name	Well DOB	Original Capacity, in gpm	Dec 84 — Jan 85 Capacity, in gpm	Well age as of 2/85	December 84 Operating Days	%	Jan 85 Operating Days	%	Total Days	% On
611	(New 623)	8/1/1984	360	242 (9/85)	0.5	27	87%	30	97%	61	87%
614	(New 622)	6/1/1984	323	320 (9/85)	0.7	23	74%	30	97%	57	81%
621	(New 629)	10/1/1984	NA	NA	0.3	26	84%	16	52%	43	61%
627	(New 661)	8/1/1984	192	280 (10/84)	0.5	28	90%	31	100%	66	94%
639 (New)	(New 662)	10/1/1984	146	146 (10/83)	0.3	26	84%	26	84%	59	84%

- **Point 2:**

The lack of use of well HP-651 in December 1984 had nothing to do with the well's capacity as demonstrated by its capacity tests. Well HP-651 Capacity Data listed on page S1.71 of the HPHB Chapter A–Supplement 1 (Sautner et al. 2013)[12] Descriptions and Characterizations of Data Pertinent to Water-Supply Well Capacities, Histories, and Operations show the last capacity test

[12] CLJA_WATERMODELING_05-0000826112, found in CLJW_WATERMODELING_05-0000826036 – 05-0000826153

was 10/29/1984 and the well operated at 242 gpm—which ranks in the Top 10 highest capacity wells at the time.

Table 4.6. Sautner et al. (2013), p. S.71.

Well HP-651

[gpm, gallon per minute; —, no data; VOC, volatile organic compound; USGS, U.S. Geological Survey]

Date	Capacity, in gpm	Operational status	Data source
12/30/1971	200	Construction completed	Driller[1]
7/1/1972	—	In service	Estimated date
1/1976	—	In service	CLW-4039
3/31/1977	190	In service	Well capacity test
1/1978	—	In service	Operation records
1/10/1979	167	In service	Well capacity test
2/13/1980	178	In service	Well capacity test
7/26/1981	232	In service	Well capacity test
1/1982	—	In service	Operation records
9/14/1983	239	In service	Well capacity test
10/29/1984	242	In service	Well capacity test
1/1985	—	In service	Operation records
2/1985	—	"Contaminated"	Operation records
2/4/1985	—	Out of service	CLW-4913[2]
2/4/1985	—	Service terminated	CLW-4913[2]
6/1994	—	Abandonment	AH Environmental Consultants[3]

[1]Corbin Construction Company, written communication, December 30, 1971

[2]Well secured due to VOC contamination

[3]AH Environmental Consultants, Inc., electronic communication, September 3, 2004

Data sources:

CLW, Camp Lejeune Water Documents 3559–3561, 3573–3575, 3585–3587, 3588–3590, 3641–3643, 3644–3646, 3772–3774, 3775–3777, 3996–3997, 3998–4000, 4044–4046, and 4047–4049

USGS, operation records, written communication, March 2004

- **Point 3:**

When compared to other wells that were supplying raw water during that time, well HP-651's age is also not a reason for its lack of operation in December 1984. Well HP-651's completed construction date (a/k/a/ DOB) was 7/1/1972 making it only 12.6 years old as of 2/1/1985. In comparison, well HP-616 operated at 57% in December 1984 and its DOB is 1/1/1943 making it 42.1 years old on 2/1/1985. Its last capacity test placed it at 210 gpm—still substantial, especially considering its age. The same holds true for well HP-632. In December 1984 it operated at 64% at an age of 27.7 years (DOB 5/27/1957). When tested on 10/1984 its capacity was 201 gpm.

- **Point 4:**

The fact that well HP-651 only operated at 6% could also be attributed to the pumping schedule being used at the time. As outlined extensively in ATSDR's reports (Telci et al. 2013),[13] ATSDR used current (2008) pumping data as a "training period" to reconstruct well operations during the historical period ("predictive period"). On those wells that were shut down due to contamination, "surrogate wells" were used for the "training period" (Telci et al. 2013, Table S2.2)[14]. HP-651 was shut down in February 1985 so well HP-633 was used as its surrogate. If we look at the historic pumping schedule that was created for HP-651 based on HP-633 we see there is a cycle:

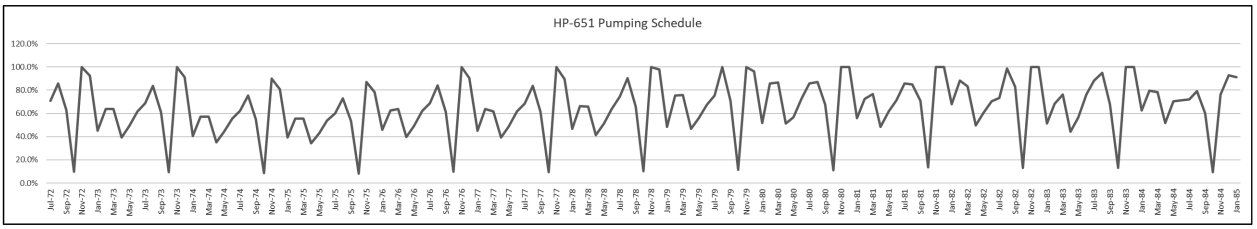


Figure 4.5. Reconstructed historical pumping operations for well HP-651 (from Telci et al. 2013)

In the reconstructed pumping operations cycle, well HP-651 drops below 10% every October. This cycling was common for several reasons, including substantial reductions in consumption and demand owing to deployment of troops and climatic conditions where October and generally Fall to early Winter are "wet months." It is very possible that the actual low-cycle month for HP-651 was December and not October, which would explain the 6% value of operation time for December of 1984.

In addition to those points outlined above there are other reasons why this period should not be used to represent normal operation of not only HP-651 but the well field in general.

- **Reason 1**

The first and foremost reason why this is not a representative time period is because November 30, 1984 marked the start of the investigation into the sources of contamination at HP. Well HP-602 was shut down on 11/30/1984. Additional testing on 12/4/1984 and 12/10/1984 resulted in well HP-608 being shut down permanently on 12/6/1984 and wells HP-634 and HP-637 being shut down temporarily on 12/14/1984. This disruption is not a normal occurrence and therefore adds to the reasons why this period of time should not be used to determine historic pumping schedules for any wells.

- **Reason 2**

As outlined in my Expert Report (Maslia 2024) the HBWTP had to be shut down from 1/27/84 to 2/7/85 due to a fuel line contaminating the HB water supply. During this time HPWTP had to supply

[13] CLJA_WATERMODELING_05-00001005675 – 05-00001005810.
[14] CLJA_WATERMODELING_05-00001005695.

all finished water for the HB area, in addition to its own, which is not representative of normal operation.

- **Reason 3**

Based on ATSDR's research into Camp Lejeune's water treatment plant's operations, it became apparent that the WTP operators would not cease operating a 12.6-year-old well (HP-651) that at 12 years of age is still producing more than 240 gpm. In July 1972, well HP-651 would have been operated very similar to that of the new wells discussed previously—wells New 623, New 622, New 629, New 661 and New 662, which were operated at 70% – 100% capacity.

- **Reason 4**

Camp Lejeune is a military base. Therefore, production and consumption of water are determined by demands for: (a) fire protection, (b) housing , facilities, and recreation,(c) utility requirements (steam and heat production), (d) troop deployments, (e) leave for rest and relaxation, and (f) a combination of (a)-(e) above. ATSDR staff observed an example of the impact of troop deployment on production and consumption of water supplies during the conduct of a field test of the HPWTP service area during May 2004 (Sautner et al. 2005). During this field test, ATSDR requested that Camp Lejeune water utility operators increase normal water production of the HPWTP from about 1,600 gpm to about 2,100 gpm so ATSDR could conduct tracer tests. On the final day of the test, water utility staff told ATSDR that they would need to reduce production back to the 1,600 gpm at the HPWTP because they were "spilling water from the elevated storage tanks." Camp Lejeune water utility staff indicated that a substantial reduction in demand was being observed because of troop deployments.

RH's position on well HP-651 is an attempt to lower concentrations that occurred at Camp Lejeune during 1953 – 1987 using incorrect and/or select, non-representative data. RH's contentions regarding HP-634 are incorrect and the same holds true for HP-651. Supply well HP-651 was a major contributor to the raw water supply from June 1972 – February 1985, and the ATSDR reconstructed pumping schedule accurately reflects well HP-651's overall operation. RH's claim of 39% lifetime operation is made without a thorough review of the documents he is relying on to support his position.

4.3 Volatilization of VOCs During Water Treatment Process

DOJ expert (RH) posits that a substantial portion of chemicals of concern in the raw water was unavoidably lost during subsequent storage, treatment, and distribution (Hennet 2024, Section 5, Opinion 2). His report goes through numerous calculations that he claims show substantial percentages of VOCs volatilizing off during the water treatment and storage process at the WTPs (Tarawa Terrace and Hadnot Point).[15] For example, in Hennet's Exhibits 2-4 and 2-5 (2024, p. 5-6 – 5-11) he computes an "Overall Evaporative Removal" of VOCs of concern at the HPWTP as: 18.34% (PCE), 17.07% (TCE), 22.41% (1,2-tDCE), 32.48% (VC), and 15.12% (Benzene). For the TTWTP, Hennet computes the "Overall Evaporative Removal" of VOCs of concern as 18.84% (PCE), 17.63% (TCE), 23.23% (1,2-tDCE), 33.41% (VC), and 15.68% (Benzene). These calculations

[15] The Holcomb Boulevard WTP (HBWTP) was never supplied with contaminated raw water.

substantially exceed values of volatilization computed by the consultant to the U.S. Marine Corps (USMC), AH Environmental Consultants in its December 2004 report on Estimation of VOC Removal (AH Consultants 2004).[16] Specifically, Section 5 (Summary) of the AH Consultants report states:

> "The calculations revealed that VOC removal due to volatilization from quiescent basins was negligible at MCB Camp Lejeune. The only significant VOC removals must have occurred at the spiractor effluent pipe, where the falling water undergoes some aeration. Considering the uncertainty in the estimates for the fall height over the weir formed by the pipe, the removals for TCE and PCE were likely to be less than 15%."[17]

Earlier in its report, AH Environmental Consultants (2004, (pages 4-1 – 4-2) found that "volatilization due to aeration at the spiractor effluent pipe resulted in TCE and PCE removals of 6.1% and 7.7% at the design flow rate 700 gpm, respectively. … A sensitivity analysis showed that the fall height has the largest effect on VOC removal at a weir." This sensitivity analysis conducted by AH Environmental Consultants (2004) found that removal of PCE and TCE is nearly proportional to the fall height from the spiractor. AH Environmental Consultants (2004) went on to explain that the fall height at Hadnot Point was only 1 foot but at Holcomb Blvd it was 2 feet. It was this uncertainty along with "additional uncertainties … introduced by varying head losses in the pipes caused by calcium carbonate scale build-up and manual cleaning" that led AH Environmental Consultants (2004) to state at page 4-4 that "it is estimated that PCE and TCE removals due to aeration at the spiractor effluent pipes are likely to be *no larger than* 15%."

To assess the DOJ expert's (RH) calculations and conclusions, Dr. David R. Sabatini conducted a detailed analysis of the volatilization of VOCs for the Camp Lejeune WTPs including volatilization from mobile water units (a/k/a water buffaloes[18]), and this analysis is adopted and incorporated by reference into this report. Results of this analysis are summarized by Sabatini (2025, Section 5.1.4) for the TTWTP and HPWTP are listed Table 4.7 (Sabatini (2025, Table 5.3).

Table 4.7. From Sabatini (2025), Table 5.3.

Source	TCE (%)	PCE (%)	1,2-tDCE (%)	VC (%)	Bz (%)
Spiractor (Sec 5.1.1)	5.2	6.2	5.9	9.9	4.3
Storage tanks (Sec 5.1.2)	<1	<1	<1	<1	<1
Other losses (Sec 5.1.3)	<1	<1	<1	<1	<1
My Estimate - overall losses	**<7.2**	**<8.2**	**<7.9**	**<11.9**	**<6.3**
AH Environmental (2004), p.5-1	<15	<15	-	-	-
Hennet (2024) Exhibit 2-6, p.5.14	17	18	22	32	15

[16] CLJA_WATERMODELING_01-0000334594 – 01-0000334660.
[17] CLJ_WATERMODELING_01-0000334634.
[18] Detailed analyses and discussions of the water buffalo types used at Camp Lejeune and the filling process during the historical period of VOC exposure are provided in Appendix A to Dr. Sabatini's report and are not discussed in this report.

As Sabatini (2025) states in his report, "As such, I conclude that Hennet (2024) overestimated the potential losses in the water treatment processes. The actual loss values, in my opinion, were less than 6 to 12% for the VOCs of interest versus 15% to 32% as suggested by Hennet (2024)."

For the mobile water units (water buffaloes), Sabatini (2005, Section 5.3) concludes:

"Hennet's calculations overestimated the VOC losses during filling of the water buffaloes; he estimated 41% to 61% for the range of VOCs while I estimate much lower (15 to 22% through filler pipe/strainer and 4.2 to 6.7% through the manhole, including daily use not accounted for by Hennet) for the range of VOCs, I thus conclude that the water buffalo water was only mildly to moderately lower in VOCs, not substantially lower as Hennet (2024) states."

Sabatini's (2025), Table 5.7, provided in this report as Table 4.8, lists a summary of the overall VOC losses in water buffaloes based on Hennet's (2024) calculations and Sabatini's (2025) estimates for filling the water buffaloes from the filler tank and from the manhole cover.

Table 4.8. From Sabatini (2025), Table 5.7.

[My estimate refers to Sabatini (2025)]

Source	TCE (%)	PCE (%)	1,2-tDCE (%)	VC (%)	Bz (%)
(1) Hennet – filler pipe/strainer - Overall loss (see Table 5-6, Row 2))	41	44	54	61	45
(2) My estimate – filler pipe/strainer overall filling losses (see Table 5.6, Row 3)	14	15	18	20	15
(3) My estimate – filled by standpipe through manhole cover – 5.6% of Hennet's Row 1 values in Table 5.6	3.0	3.2	4.0	4.5	3.3
(4) My estimated losses during daily use of water buffaloes (Exhibit C.4)	1.2	1.0	1.9	2.2	1.2
(5) My estimate – overall losses – filler pipe strainer plus daily use (Row 2+4)	15	16	20	22	16
(6) My estimate – overall losses – standpipe filling through manhole plus daily use (Row 3+4)	4.2	4.2	5.9	6.7	4.5

In summary, the detailed calculations of both AH Environmental Consultants (2004) and Dr. Sabatini (2025) demonstrate that the DOJ expert (RH) has vastly overestimated alleged VOC losses

during storage, treatment and distribution. In addition, RH's assertion that ATSDR did not account for such VOC losses (Hennet 2004, Opinion 10, p. 5-36) is incorrect. First, ATSDR analyzed sampling data of water from both pretreatment and post treatment. Table 4.9 lists sampling data for the HPWTP including sampling status (treated or untreated) where known. Out of the 20 water samples taken at the HPWTP, 7 were from treated (finished) water, 4 were from untreated, and 9 had unknown treatment status. Furthermore, for TCE samples taken on 7/27/1982, results show that the concentration for untreated water was 19 µg/L and for treated water was 21 µg/L. Allowing for measurement error, these data indicate no losses to volatilization of TCE during the treatment process.

Table 4.9. Treatment status of water samples from the Hadnot Point water treatment plant

Date	Measured in µg/L	Treatment Status	Reference or Citation	Bates Identification
Tetrachloroethylene (PCE)				
5/27/1982	15	Unknown	CLW 0606	CLJA_USMCGEN_0000003332
7/27/1982	100	Unknown	CLW 0606	CLJA_USMCGEN_0000003332
12/4/1984	3.9J	Treated	CLW 5632	CLJA_USMCGEN_0000009913
2/5/1985	7.5J	Treated	CLW 5509	CLJA_USMCGEN_0000005529
Trichloroethylene (TCE)				
5/27/1982	1400	Unknown	CLW 0606	CLJA_USMCGEN_0000003332
7/27/1982	19	Untreated	CLW 0606	CLJA_USMCGEN_0000003332
7/27/1982	21	Treated	CLW 0606	CLJA_USMCGEN_0000003332
12/4/1984	46	Untreated	CLW 5632	CLJA_USMCGEN_0000009914
12/4/1984	200	Treated	CLW 5632	CLJA_USMCGEN_0000009913
12/12/1984	2.3J	Treated	CLW 5644	CLJA_USMCGEN_0000003979
12/19/1984	1.2	Untreated	CLW 4546	ATSDR_WATERMODELING_01-0000886764
2/5/1985	429	Unknown	CLW 5509	CLJA_USMCGEN_0000005529
***Trans*-1,2 Dichloroethylene (1.2-tDCE)**				
12/4/1984	83	Treated	CLW 5632	CLJA_USMCGEN_0000009913
12/4/1984	15	Untreated	CLW 5632	CLJA_USMCGEN_0000009914
12/12/1984	2.3J	Treated	CLW 4546	ATSDR_WATERMODELING_01-0000886764
2/5/1985	150	Unknown	CLW 5509	CLJA_USMCGEN_0000005529
Vinyl Chloride (VC)				
2/5/1985	2.9J	Unknown	CLW 5509	CLJA_USMCGEN_0000005529
Benzene				
11/19/1985	2500	Unknown	CLW 1355	CLJA_USMCGEN_0000007001
12/10/1985	3	Unknown	CLW 1355	CLJA_USMCGEN_0000007001
12/18/1985	1	Unknown	CLW 1355	CLJA_USMCGEN_0000007001
Note 1: J = Estimated				
Note 2: Data from Faye et al. (2010, Tables C11 and C12); Maslia et al. (2013, Table A18)				

At the TTWTP a triplet of measured water samples obtained on 7/28/1982 show results as follows: 104 μg/L in "finished water", 76 μg/L in "untreated water", and 82 μg/L in "treated water",[19] indicating no PCE loss to volatilization during the treatment process.

Additionally, in contrast to RH's contention that ATSDR ignored or did not account for VOC losses during storage, treatment and distribution, this issue (including the results of the AH Environmental Consultants report [2004]) was discussed in detail with the Expert Panels convened by ATSDR in 2005 and 2009 (Maslia, 2005, 2009). During the first day of the meeting in 2005 (March 28) panel members Dr. Tom Walski (Bentley Systems) and Dr. Peter Pommerenk (AH Consultants and consultant to the USMC) responded to a question from panel member Dr. James Uber (University of Cincinnati) to Morris Maslia about whether there are any potential chemical biological processes taking place in the distribution system.[20] Additional discussion occurred during the 2009 Expert Panel meeting (April 30) by Dr. Pommerenk.[21] Excerpts from the verbatim transcript are provided in Appendix **A**. The consensus was that there was negligible volatilization (at most 10% from the spiractors). "So although we said it's probably negligible, and I agree with Tom's number here. At 90 percent, what's going in is coming out on the other end." (see Appendix **A**). In light of the conclusions of AH Environmental Consultants (2004) and the recommendations of its Expert Panels, ATSDR made the decision to consider any potential VOC losses from storage, treatment and distribution as negligible.

Additional support for this decision comes from the eight-day period, January 28-February 8, 1984, when the HBWTP was shut down and not operating. At that time, the HPWTP provided finished (and contaminated) water to the HB water-distribution system by operating booster pump 742 and opening the Marston Pavilion valve (Maslia et al. 2013, p. A2, p. A65). Water samples taken on January 31, 1985, indicated TCE concentrations ranged from 24.1 mg/L to 1,148.4 mg/L, with a sample taken at the HPWTP (Building 20, treatment status unknown) having a TCE concentration of 900 mg/L.[22] Although not a direct indication of negligible TCE loss to volatilization during the treatment process at the HPWTP, these samples, taken from the HB water-distribution system (supplied by contaminated HPWTP finished water), suggest that any loss of VOCs owing to volatilization in the treatment process were consistent with the advice of the ATSDR Expert Panels (Appendix A) and the findings of AH Environmental Consultants (2004) and Sabatini (2025).

4.4 Derivation and Computation of Sorption Parameter Values

DOJ experts AS and RH posit that selected geochemical parameters (sorption parameters) were incorrect (Spiliotopoulos 2024, Section 4.1.2.2) and that ATSDR failed to consider site data to parameterize models (Hennet 2024, Opinion 12). Both opinions are incorrect. A detailed response pertinent to sorption parameters for the TT analyses is presented below and is also provided in Konikow (2025).

ATSDR applied and calibrated the MT3DMS model to evaluate the occurrence and migration of contaminated groundwater at TT. MT3DMS, a multi-species, mass transport model, is a widely

[19] CLJA_USMCGEN_0000009869.
[20] CLJA_WATERMODELING_01-0000942379 – 01_0000942381.
[21] CLJA_WATERMODELING_02-0001111469 – 01-0001111472.
[22] CLW 4552, CLJA_WATERMODELING_09-0000424939.

used public domain model code used to simulate the migration of solutes/contaminants in groundwater (Zheng and Wang, 1996; Zheng 2010).

To account for sorption, MT3DMS computes a retardation factor (R), which, in turn, requires the selection of an equilibrium isotherm. A linear equilibrium isotherm was selected for the TT MT3DMS model. The retardation factor and the linear equilibrium isotherm are related by the following formula:

$$R_f = 1 + (K_D \times \rho_b)/n_e \qquad (1)$$

where

R_f = the retardation factor, dimensionless

K_D = the distribution coefficient, in L^3/M

ρ_b = the bulk density, in M/L^3

n_e = the effective porosity of the porous media, dimensionless

(M=mass; L=length))

The K_D is a parameter that accounts for adsorption to mineral and/or organic material in the soil. While a chemical is adsorbed to soil, it does not move with the groundwater, so that the chemical migrates through the subsurface more slowly than the average groundwater velocity. This slower chemical velocity is quantified by the retardation factor, which is the ratio of the average water velocity to the chemical velocity. A R_f of 2, for example, indicates that the chemical moves at half the average groundwater velocity because of adsorption.

As seen in Equation (1) above, the R_f depends on the product of the ρ_b (bulk density) and K_D. Different combinations of K_D and ρ_b (and effective porosity, n_e) can thus result in the same retardation factor and will calibrate a model equally well. For example, a K_D value of 0.5 and a ρ_b of 2.0 would result in the same R_f as a K_D value of 0.6 and a ρ_b of 1.67, because 0.5 x 2.0 = 1, and 0.6 x 1.67 also equal 1. Because contaminant movement in groundwater depends on the R_f, an erroneous ρ_b and an erroneous K_D can compensate for each other because they are multiplied together, resulting in a R_f that best calibrates a model even though the individual ρ_b and K_D are not correct or are unknown.

During model calibration, the ρ_b and n_e were held constant while K_D was varied (i.e., K_D is a model calibration parameter). This approach was largely dictated not only by the several divergent methodologies used to determine K_D, generally batch and column experiments, but also by the high uncertainty and variability of reported K_D values, regardless of methodology. The EPA in its Volume II of *Understanding Variation in Partition Coefficient, K_D, Values* (USEPA 1999, Volume II, p 3.4) states *"The K_D values reported in the literature for any given contaminant may vary by as much as 6 orders of magnitude."* Similarly, Spiliotopoulos (2024, Appendix A) tabulates site-specific K_D values for total organic carbon (TOC) at Camp Lejeune that vary by at least 3 orders of magnitude.

The initial K_D values used during calibration of the Tarawa Terrace MT3DMS model were derived largely from Hoffman (1995) and were determined from column experiments performed on sediment samples collected from 240 boreholes drilled into a plume contaminated with PCE and trichloroethylene (TCE). Borehole samples were composed largely of sand, silt and gravel, similar to the subsurface at Tarawa Terrace. Borehole sediments also contained low concentrations of total organic carbon. The K_D values for PCE reported by Hoffman (1995) related to silt and sand ranged from about 0.20 to 0.80 milliliters per gram (ml/g) and averaged 0.40 and 0.39 ml/g, respectively. The K_D determined from the completion of MT3DMS model calibration was 0.14 ml/g and was somewhat less than values determined by Hoffman (1995). The retardation factor (R_f) determined from MT3DMS calibration was 2.93 (Faye 2008) and is very close to other values reported in the literature for similar geologic materials (e.g., Rogers 1992)

In his report, Konikow (2025) also discusses Hennet's (2024, Opinion 11) criticism of ATSDR for having failed to consider available site-specific data for f_{oc} (fraction of organic content) to estimate K_D . However, as Konikow (2025) points out:

> "Rogers (1992, p. 51) in discussing the K_d parameter says "Numerous researchers have used theoretical methods correlating the organic carbon content (OCC) of the subsurface material and the K_d (Karickhoff, 1984). Others have used the partitioning between octanol and water to predict the K_d (Kenega, 1980). **These methods are not considered appropriate where the OCC is less than approximately 0.1%**." OCC is equivalent to TOC, and 0.1% is equivalent to a fraction or 0.001. Hennet's Expert report lists (Exhibit 3-2, and p. D-11 to D-12) 21 Camp Lejeune samples where f_{oc} is given. The median value is 0.0013, barely above the indicated limit, and 9 samples (43% of the samples) have values <0.001, indicating that the use of f_{oc} to estimate K_d is not appropriate. If ATSDR had used this approach, it would have introduced additional errors and sources of uncertainty."

Following calibration of the Tarawa Terrace MT3DMS model and the subsequent peer reviews and publication of model results, a member of the 2009 ATSDR Expert Panel (April 29–30) indicated in his pre-meeting comments on published ATSDR analyses that a wet rather than a correct dry bulk density was input to MT3DMS (Maslia 2009, p. 117)[23] . Because transport models depend on the retardation factor which, in turn, is determined by the product of K_D and bulk density (Equation 1), the erroneously high bulk density implied that the value of K_D was too low. Accordingly, project staff resumed calibration of the Tarawa Terrace MT3DMS model by assigning a corrected bulk density (ρ_b) of 1.65 g/ml (46,725 g/ft^3) to MT3DMS and testing simulated results by varying K_D values ranging from 0.20 to 0.40 g/ml (Hoffman, 1995). Test simulations were determined to be relatively insensitive to changes in K_D; however, K_D values near the low part of the range (0.20 ml/g) were determined most comparable to best calibration. Finally, a corrected TT MT3DMS model was achieved using a dry bulk density of 1.65 g/ml and applying Equation (1) to compute a paired K_D value of 0.23 ml/g, thus maintaining the calibrated retardation factor (R) of 2.93 and model results as published (Faye 2008). Thus, the initial erroneous bulk density value had no effect on the final model calibration, which depended only on the product of K_D and ρ_b through the R_f. Note, the K_D value of 0.23 ml/g input to the corrected MT3DMS model is within the lower part of the range for this value applicable for PCE published by Hoffman (1995).

[23] CLJA_UST02-0000059851

By comparison, and as Dr. Konikow discusses in his report (Konikow 2025), "Kret et al. (2015) studied a Quaternary sandy aquifer to estimate sorption coefficients for PCE fate and transport modeling. They estimated K_D from both batch and column experiments and concluded that reasonable values for R_f for PCE are typically between 1.1 and 3.6." The ATSDR calibrated value of 2.93 is very near the mean of this range. As Dr. Konikow points out, Rogers (1992) also supports the ATSDR's calibrated value. There, a groundwater transport model was developed for the Lawrence Livermore National Laboratory (LLNL) site in California, which includes "several hundred feet of complexly interbedded, unconsolidated alluvial sediments" with an upper boundary represented by an unconfined water table condition. Their calibration and history matching resulted in reasonable matches for R_f values between 1.0 and 3.0, with their conclusion that "a spatially averaged retardation factor of approximately 3 is recommended...".

The values used by Spiliotopoulos (2024) for ρ_b (1.65 g/cm^3) and for K_D (0.30 and 0.40 mL/g) result in R_f values of 3.48 and 4.30, respectively, which are on the high-side of many literature-reported values and the calibrated value of 2.93. Using the Spiliotopoulos (2024) values in effect slows the movement of PCE through the aquifer and increases the time at which PCE-contaminated groundwater arrives at water-supply wells and the TTWTP (Spiliotopoulos 2024, Figures 7 and 8). Spiliotopoulos (2024, p. 37-38) also posits a R_f of 6.44 but provides no supporting evidence or reference for this value. What Spiliotopoulos has done is in essence conduct a sensitivity analysis using R_f as the varied parameter. However, Dr. Spiliotopoulos did not adjust ρ_b and/or n_e to best calibrate the model using his higher K_D values. The higher R_f based on Dr. Spiliotopoulos' larger K_D values do not calibrate the model as well as the R_f used by the ATSDR team. In addition, as shown in Faye (2008), the calibrated TT fate and transport model is relatively insensitive to changes in R_f (K_D being the varied parameter in R_f). Instead, the model is substantially more sensitive to changes in mass loading rate and pumping variation.

ATSDR documented the above modifications to ρ_b and K_D in an email (and attachment) dated February 28, 2011.[24] ATSDR had planned to issue an errata pertinent to the updated ρ_b (dry) and K_D as a forthcoming TT Chapter K report (mentioned in the Foreword Section of all published TT reports). Agency budgetary and project completion time constraints prevented the errata and any supplemental information from being formally published and publicly released as the TT Chapter K report.

To test the effect that variations in R_f have on PCE concentrations at water-supply well TT-26 and the TTWTP, a series of simulations were conducted wherein the calibrated retardation factor of 2.93 (Faye 2008) was increased to 3.48 and 4.3 as speculated by AS and RH. As these sensitivity analyses (variations in retardation factor) demonstrate in Figure 4.6 below, the model is insensitive to changes (increases) in the retardation factor. After 1960, simulated results show PCE concentrations at TT-26 and at the TTWTP more than the MCL for PCE of 5 µg/L.

[24] ATSDR_WATERMODELING_01-0000887322 and 01-0000887324.

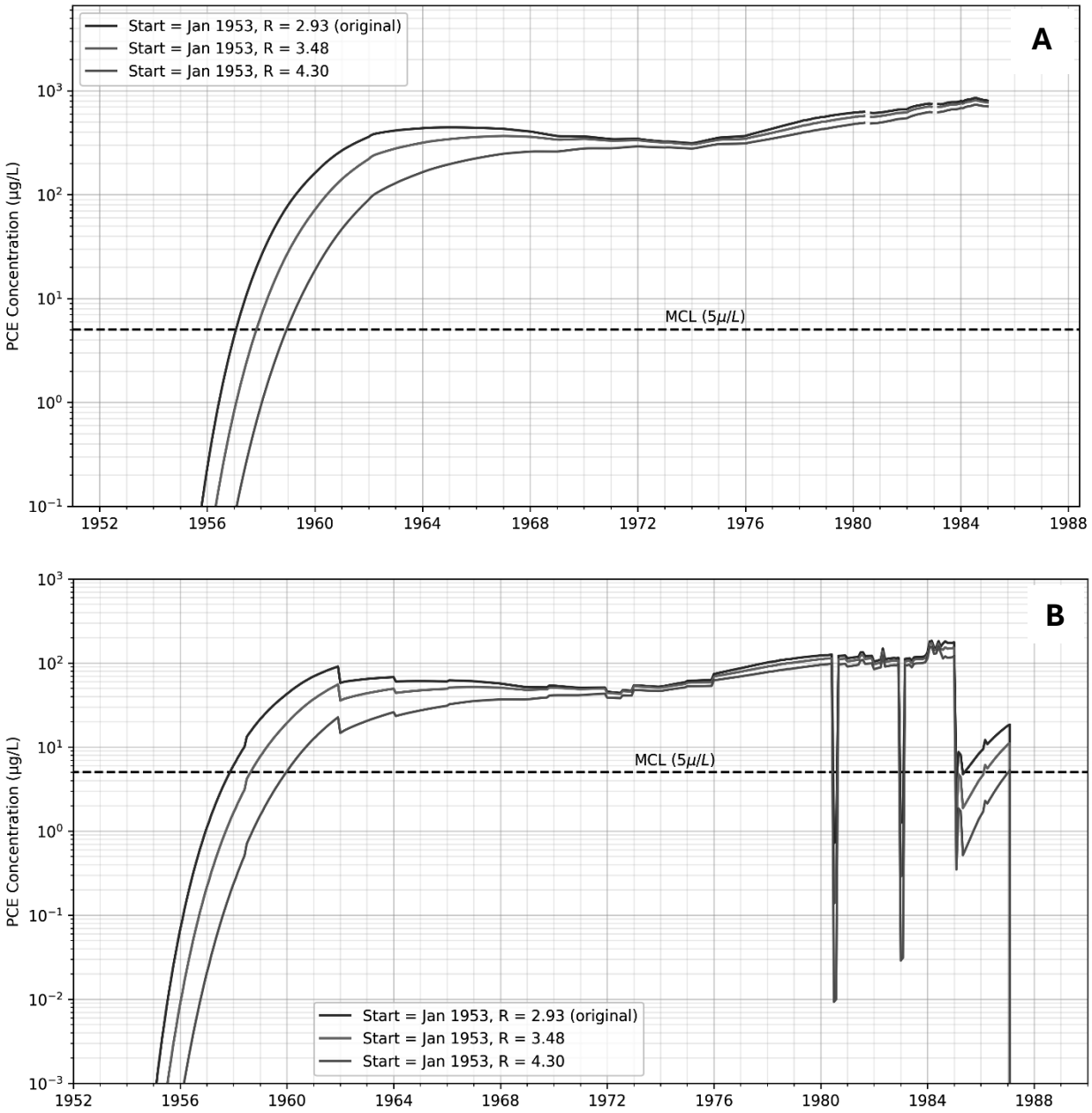


Figure 4.6. Comparison of tetrachloroethylene (PCE) reconstructed concentrations for variations in retardation factor for: (A) water-supply well TT-26, and (B) Tarawa Terrace water treatment plant (TTWTP). Note: R = 2.93 is calibrated retardation factor from Faye (2008).

4.5 Model Calibration and Uncertainty Analysis

Rebuttal responses to criticisms related to model calibration and uncertainty analysis raised by AS (2024) and RH (2024) are provided below.

4.5.1 Model Calibration

In Opinion 1, AS posits that the ATSDR models were not "calibrated to observed data for the first 30 years of simulation" (Spiliotopoulos, 2024, p. 30). However, it is crucial to understand that concentration data for that period do not exist, which is exactly why reconstruction was performed. The ATSDR models were designed to estimate those concentrations in a state-of-the-art manner, consistent with principles of groundwater flow and fate and transport processes. These models did not generate arbitrary random numbers; rather, the results are reasonable and realistic. The presence of error bands or uncertainty ranges around the estimates is to be expected and is readily acknowledged (Konikow 2025).

In his Opinion 2, AS (2024, p. 33) reproduces ATSDR's Figure F16 (Faye 2008)[25] of TT historical reconstruction results at water supply well TT-26, and states that ASTDR's work resulted in "biased high estimates." As Dr. Konikow notes, Figure F16 (provided in this report as Figure 4.4 in Section 4.2.1) illustrates the opposite and instead "shows 5 measured PCE concentrations in samples from well TT-26 collected within weeks of each other in early 1985. Over this relatively short time span, the concentrations varied greatly (bracketed between a high of 1,580 μg/L on 01/16/1985 to a low of 3.8 μg/L on 02/12/1985)—a rate of change that cannot be replicated in a model using monthly time steps. Most importantly, the plot shows that the model results fell almost exactly at the midpoint of the range of observed values (about 800 ug/L)—countering the claim of being biased high." (Konikow 2025)

The plot shown in Spiliotopoulos (2024, Figure 13) is discussed in AS's Section 4.1.3.2 (p. 50, paragraph 8). It is noted that the results of the calibrated model, as AS states, "sits at the upper bound of the retardation-factor uncertainty range." However, as Dr. Konikow notes and I agree, "that is not true for the majority of the simulation period. It is close to the middle of the range during the period of 1962 through the end (around Dec. 1987). And prior to 1962, it still lies within the uncertainty bounds, which is acceptable and not indicative of bias." (Konikow 2025). Furthermore, calibrated model results do not always lie at the center of the uncertainty band because the response of the model to some parameters can be non-linear, and a model can be insensitive to changes in a model parameter at either high or low extremes.

For water-supply well HP-651, ATSDR applied the Linear Control Model (LCM) to reconstruct concentrations of TCE, PCE, and PCE degradation products (TCE, 1,2-tDCE, and VC). In Opinion 16 (Spiliotopoulos 2024, Section 4.2.4, p. 82-83) AS argues that the model for volatile organic compound (VOC) degradation products was based on limited data, and ATSDR's historical reconstruction prior to December 1984 "cannot be verified."

[25] Figure 4.4 of this report, previously discussed in Section 4.2.1

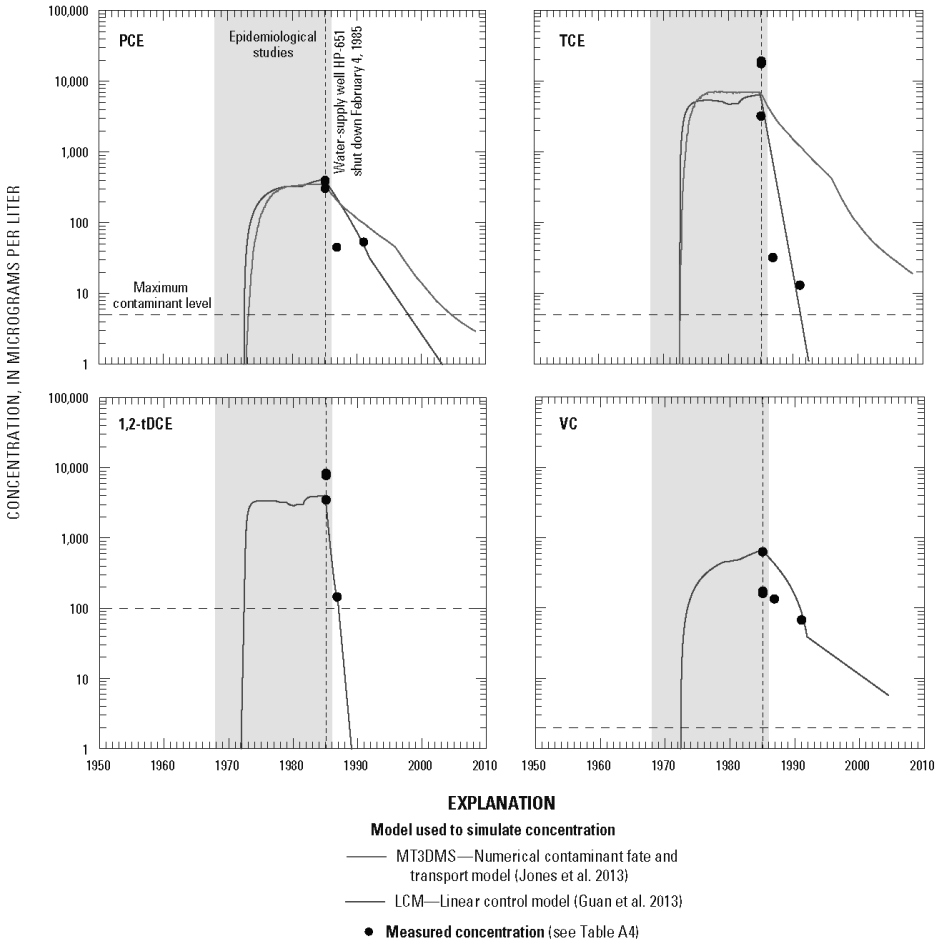


Figure A25. Reconstructed (simulated) concentrations of tetrachloroethylene (PCE), trichloroethylene (TCE), *trans*-1,2-dichloroethylene (1,2-tDCE), and vinyl chloride (VC) at water-supply well HP-651 using numerical (MT3DMS) and linear control methodology (TechControl) models, Hadnot Point–Holcomb Boulevard study area, U.S. Marine Corps Base Camp Lejeune, North Carolina. (See Figure A14 for well location.)

Figure 4.7. From Maslia et al. (2013), Figure A25.

In section 4.2.4 (p. 82-83), AS states that "As illustrated in Figure 33 [ATSDR Figure A25], the historical reconstruction prior to 1985 cannot be verified, due to lack of observed data for the period." As I have stated previously, and as Dr. Konikow also opines, this is the reason why a simulation model was needed and was developed. For the four contaminants shown in Figure 4.7 the agreement between simulated values and observed data where data was available is excellent in all four plots. If anything, the model results for TCE and 1,2-tDCE are below the peak sampled data points, again suggesting that the model is under-predicting these concentrations. "This close agreement when observations are available builds confidence in the reliability of the model and its predictions," including for the historical reconstruction results for times prior to 1985. (Konikow 2025). The objective was to use a technically sound model that would be calibrated to available data in and after 1985, and to estimate the values during the 15 or so years prior to that calibration period to inform the epidemiological studies.

The objective was to use a technically sound model that could be calibrated to available data in and after 1985 and to estimate the values during the 15 or so years prior to that calibration period to inform the epidemiological studies. As Konikow (2025) observes, for PCE and TCE, the fit with the LCM model was slightly better than with the MT3DMS model, which was not designed to simulate degradation products. The excellent quality of the fit is illustrated in Figure 4.7.

4.5.2 Uncertainty Analysis

ATSDR is transparent in its analyses and publications that uncertainty exists about conditions during both the historical reconstruction and calibration period. Results include assessments of uncertainty (Maslia et al. 2007, p. A52; Maslia et al. 2013, p. A92), including an entire Chapter Report (Chapter I) in the Tarawa Terrace report series (Maslia et al. 2009). In fact, the EPA in its Superfund Exposure Assessment Manual (1988, Section 4.4), discusses "Approaches for Dealing with Uncertainty" and the use and application of sensitivity analysis and Monte-Carlo (MC) simulation.

In his Opinion 8 (Section 4.1.3.2, p. 50, paragraph 3), AS criticizes the Monte Carlo (MC) simulation approach used by ATSDR "… because ATSDR implemented a 'probability distribution function' … to describe how values closer to the mean value of the range are more probable than those away from the mean." This is not a problem or issue as posited by AS, but rather, this is one of several accepted methods "for random sampling of parameter values for a MC analysis when information or theory indicates that a parameter has a statistically normal or log-normal distribution." (Konikow 2025). Tung and Yen (2005, Section 6.1, p. 213) state, ". . . due to the complexity of physical systems and mathematical functions, derivation of the exact solution for the probabilistic characteristics of the system response is difficult, if not impossible. In such cases, Monte Carlo simulation is a viable tool to provide numerical estimations of the stochastic features of the system response." Additionally, Bobba et al. (1995) state, "A Monte Carlo model is basically constituted by a deterministic portion (the deterministic model), of variable complexity, that is used to represent mathematically the system under observation, and a probabilistic portion, constituted by the probability distributions of both the parameters of the deterministic model (if available) and the observed variables (conditions)."

In Section 4, Basis for Opinions (p. 29), AS quotes Dr. T.P. Clement's comments about ATSDR's uncertainty analysis (Clement, 2011): "The figure also shows that closer to the initial starting point, the confidence band is almost 100%, implying that our knowledge of initial conditions, initial source loadings, and initial stresses is almost exact." Contrary to Dr. Clement's observations, both Dr. Konikow and I are confident that there was no (or negligible) PCE in the groundwater from ABC One-Hour Cleaners (or any other source) prior to January 1953, and likely very little for several months thereafter. (see Konikow 2025)

Additionally, uncertainty analysis is a process associated with simulations (Bobb et al. 1995). One cannot produce an uncertainty band at the start of simulations. If there is no simulation, there is no uncertainty. Thus, uncertainty at the start is zero when there is no simulation, and it expands as the computation process progresses forward. ATSDR did not consider uncertainty at the start of our source characterization. Instead, ATSDR assumed that prior to the start of operations at ABC One-Hour Cleaners, the concentration of PCE in groundwater was perfectly known, and it was 0 µg/L.

Another point to be made is that the graph in question in AS's critique (Maslia et al. 2007, Figure A26)[26] is the concentration time history at the TTWTP. This plot was created using a mass balance equation:

$$C_{TTWTP} = \frac{\sum_{i=1}^{NW} C_i Q_i}{\sum_{i=1}^{NW} Q_i} \quad (2)$$

where C_{TTWTP} is the concentration of water at the TTWTP for a specific month, *NW* is the number of operating wells for a specific month, C_i is the concentration of well *i* for a specific month, and Q_i is the pumping rate of well *i* for a specific month, featuring water pumped from a variety of supply wells. Most of the PCE comes from Well TT-26. All these wells are down-gradient from the source at ABC One-Hour Cleaners. While the fringe of the plume with very low concentrations arrives fairly soon, it takes several years for the bulk of the plume to arrive. Consequently, the parameter variations in the model instances within the MC simulation will lead to variations in the PCE plume. However, these variations do not manifest at the TTWTP for several years. Therefore, a narrow band early in the TTWTP timeline is expected. Even with the application of source concentration variations by ATSDR, the uncertainty band at the TTWTP would remain relatively narrow in the initial years.

In summary, ATSDR used and applied an accepted methodology for conducting an uncertainty analysis—Monte Carlo simulation using probability distribution functions. This method is described in several references including EPA's Superfund Exposure Assessment Manual (1988, Section 4.4), Tung and Yen (2005), and Zheng and Bennet (2002, p. 353). ATSDR provided specific details on how it carried out its uncertainty analysis with respect to both groundwater-flow model and contaminant fate and transport model parameters (and assigned probability distributions) in the Tarawa Terrace Chapter I report (Maslia et al. 2009, p. I30).[27] I agree with Dr. Konikow's assessment of the ATSDR uncertainty analysis where he states:

> "I do not see a problem here as this is an option within standard practice for random sampling of parameter values for a MC analysis when information or theory indicates that a parameter has a statistically normal or log-normal distribution. Zheng & Bennett (2002, p. 353) say "The Monte Carlo method is by far the most commonly used method for analysis of uncertainty associated with complex numerical methods." They further state (p. 356) "The heart of the Monte Carlo method is the generation of multiple realizations (or samples) of input parameters that are considered to be random variables. Each random variable is assumed to follow a certain probabilistic model characterized by its probability density function (PDF). The probability distributions commonly used in hydrogeologic studies include *normal*, *lognormal*, *exponential*, *uniform*, *triangular*, *Poisson*, and *beta* distributions." It is worth noting that when this book was published, co-author Bennett was an employee of SSP&A and first author Zheng was a former employee and affiliate of SSP&A" (Konikow 2025).

[26] ATSDR_WATERMODELING_01-0000909018.
[27] CLJA_WATERMODELING_01-0000772752.

4.6 Post-Audit of the ATSDR Tarawa Terrace Models

Jones and Davis (2024) conducted a post-audit of the Tarawa Terrace groundwater flow and contaminant fate and transport models by extending the TT simulations from 1995–2008 using additional ABC One-Hour Cleaners site data that had become available after ATSDR published results for TT in July 2007 (Maslia et al. 2007). Jones and Davis (2024, Executive Summary) state,

"In summary, this post-audit found that the original Tarawa Terrace groundwater flow and transport models were developed using sound methodology and continue to provide reliable insights into the migration of PCE contamination. Despite the inherent challenges in simulating complex subsurface conditions and dealing with incomplete data, the model effectively simulates long-term trends in contaminant migration. Based on this post-audit, we can find no significant evidence that would invalidate the analyses performed by ATSDR with the original model."

In his Opinion 13, AS states "Prior to offering opinions as experts in this litigation, Mr. Maslia and Dr. Aral should have used the data that Dr. Jones and Mr. Davis used to conduct the Tarawa Terrace Flow and Transport Model Post-Audit to update the calibration of the dose reconstruction groundwater model." (Spiliotopoulos 2024, p. 3).

There are few post-audits for calibrated contaminant fate and transport models to compare approaches with the Tarawa Terrace post-audit (e.g., Person and Konikow, 1986). Most post-audits have been conducted for calibrated groundwater-flow models. The literature on post-audits of groundwater and hydrological model predictions remains limited (Kidmose et al., 2023). Anderson and Woessner (1992) reviewed five post-audits from the 1990s and concluded that original model failures were primarily due to errors in conceptual models or defining future stress (such as pumping).

In reviewing the literature on post-audits (Alley and Emery, 1986; Konikow, 1986; Kidmose et al., 2023), the outcomes are generally used to identify where additional data are required and to enhance the understanding of hydrogeology and transport phenomena (conceptual model improvement). Post-audits are not necessarily conducted, as AS posits in his Opinion 13, to re-calibrate or update a calibrated model based on additional (and future) data.

Alley and Emery (1986) provide general perspectives on groundwater modeling gained from post-audit analysis, noting that "post-audit analysis of groundwater modeling studies is a valuable exercise, particularly considering that historically groundwater modeling studies have not included a strong model verification stage." In conducting a post-audit of a solute-transport model, Person and Konikow (1986) concluded that "the nature of the errors indicated a need to incorporate an additional process into the model (salt transport through the unsaturated zone)."

In extending ATSDR's original TT groundwater-flow and contaminant fate and transport model, Jones and Davis used additional site data such as recovery-well locations and operations, additional monitor-well locations, changes in recharge during the post-audit period (1995–2008), and observed PCE concentration data. Re-calibration of the TT models was not an objective and would not have yielded substantive changes to the original ATSDR results and conclusions because no conceptual model flaws (groundwater flow and contaminate fate and transport) were noted. Thus, AS's Opinion 13 is a moot point.

Finally, it needs to be noted that after the publication of ATSDR's TT Models in 2007 (Maslia et al. 2007)[28], ATSDR modeling staff recognized the value of conducting a post-audit of the TT models and they communicated this to ATSDR Senior Management and representatives of EPA Reion IV. The extension of the TT models from 1994–2007 would have required additional agency resources, modeling time, and coordination with the EPA (Region IV) to obtain all the additional data required for the post-audit.[29]

4.7 Graphing and Visualization of Data and Model Results

Konikow (2025) discusses AS's position that the presentation of results of the uncertainty analysis conducted by ATSDR for the TT model is "visually misleading" (Spiliotopoulos, 2024, Section 4.1.3.1). I agree with Dr. Konikow. The cited reason is that "they used a logarithmic scale, which visually compresses the uncertainty range around their calibrated model [results]." However, as Dr. Konikow notes, using a logarithmic scale is an accepted and common approach in engineering and scientific studies, and it is not considered misleading by scientists and engineers. Concentration data often vary over many orders of magnitude, which is why it is frequently presented using a log scale.

Furthermore, AS notes that the plot ranges over six orders of magnitude on the axis for PCE concentration, yet the width of the uncertainty bands does not span an equally wide range. Again, I concur with Dr. Konikow: "When values span such a large range, it is normal and standard to use a log plot. Using just an arithmetic scale would effectively hide all the changes in the lower part of the scale." (Konikow 2025)

AS also states (p. 46, para. 4) that "the difference between the high and low values in his Figure 11 (Maslia et al., 2009, Figure I29) is not significant enough to justify the use of a logarithmic scale." However, because the observed values span more than two orders of magnitude (excluding non-detects) and the simulated values span more than five orders of magnitude, plotting these data and results using a logarithmic scale is reasonable and informative. It is the only way to portray the early time results of the simulation in the same graphic (Konikow 2025).

4.8 Non-Degraded and Degraded PCE Historical Reconstructions

In his Summary of Opinions 10 and 11, Spiliotopoulos (2024, Section 4.1.4, p. 58) states,

"ATSDR applied two different numerical codes for modeling dose reconstruction. The results of the two codes are not in agreement. This is due, in part, to inconsistent application of contaminant source terms in the two models. Neither ATSDR, Mr. Maslia, nor Dr. Aral, provided sufficient scientific justification for selecting the higher estimated monthly contaminant concentrations for their dose reconstruction".

ATSDR has been open and transparent about the application of different models to reconstruct historical concentrations of PCE and PCE degradation products (TCE, 1,2-tDCE, and VC). All models are approximations of the real world and site-specific conditions, and modeling objectives determine the simplicity or complexity of a model to be used. Models that include different

[28] Results of the Tarawa Terrace models were publicly release during July 2007.
[29] CLJA_WATERMODELING_01-0000840256 – 01-0000840257; CLJA_WATERMODELING_01-0000070593, 01-0000070594, 01-0000065999, 01-0000021042, 01-0000837170 – 01-0000837172; CLJA_WATERMODELLING_01-0000837170 – 01-0000837171.

physical processes will naturally produce different results. This is an accepted modeling approach practiced by groundwater modelers. In the TT Chapter A report, Summary and Conclusions section (Maslia et al. 2007, p. A70)[30], both the non-degraded analysis for PCE (MODFLOW/MTDMS) and the degraded analysis for PCE (TechFlowMP) are discussed and summarized. ATSDR did not, as AS states "select[ing] the higher estimated monthly contaminant concentrations for their dose reconstruction" (Spiliotopoulos 2024). The water-modeling staff, being blinded to the epidemiological study through the entire water-modeling process, provided both the non-degraded (MODFLOW/MT3DMS) and degraded (TechFLOWMP) historical reconstruction results to the ATSDR health studies staff.

For the Tarawa Terrace historical reconstruction analysis, ATSDR applied a simplification of the biochemical processes such as volatilization and biodegradation taking place in the subsurface and used a model (MODFLOW/MT3DMS) that does not consider the biodegradation of PCE. ATSDR's philosophy was to "start simple" to try to understand aquifer and transport characteristics before attempting a more complex modeling effort that included biochemical processes such as volatilization and biodegradation of PCE. Again, this is a common and accepted modeling approach. Using a four-stage, hierarchical calibration approach, ATSDR achieved acceptable or better calibrations for predevelopment and transient groundwater flow, contaminant fate and transport (using MT3DMS), and the simple mixing model, as evidenced by the comparison of reconstructed and observed PCE concentrations at the TTWTP (Maslia et al., 2007, Figure A39; Fay 2008, Table F14 and Figure F27). Table 4.10 of this report, which is taken from Faye (2008, Table F14), shows that the model achieves acceptable matches between reconstructed and observed PCE concentrations at the TTWTP. In fact, even for observed non-detections, most reconstructed PCE concentrations are within the published detection limits (a non-detect does not imply zero concentration, but that the sampling and testing methodologies were not sensitive enough to detect concentrations). At the TTWTP storage tank (STT-39), the reconstructed PCE concentration was 176 μg/L compared to an observed PCE concentration of 215 μg/L—quite an impressive match for water-quality data—resulting in a geometric model bias of solely 1.5 (Maslia et al. 2007).[31]

[30] ATSDR_WATERMODELING_01-0000909028.
[31] ATSDR_WATERMODELING_01-0000908983 – 01-0000908984.

Table 4.10. From Faye (2008). Table F.14.

Table F14. Computed and observed tetrachloroethylene (PCE) concentrations in water samples collected at the Tarawa Terrace water treatment plant and calibration target range, U.S. Marine Corps Base Camp Lejeune, North Carolina.

[µg/L, microgram per liter; TTWTP, Tarawa Terrace water treatment plant; ND, not detected]

Date	PCE concentration, in µg/L		Calibration target range, in µg/L
	Computed[1]	Observed	
[2]TTWTP Building TT-38			
5/27/1982	148	180	25–253
7/28/1982	112	[3]104	33–329
7/28/1982	112	[3]76	24–240
7/28/1982	112	[3]82	26–259
2/5/1985	176	[3,4]80	25–253
2/13/1985	3.6	[5]ND	0–10
2/19/1985	3.6	[6]ND	0–2
2/22/1985	3.6	[5]ND	0–10
3/11/1985	8.7	[6]ND	0–2
3/12/1985	8.7	[6,7]6.6	2.1–21
3/12/1985	8.7	[6,8]21.3	6.7–67
4/22/1985	8.1	[5]1	0.3–3.2
4/23/1985	8.1	[5]ND	0–10
4/29/1985	8.1	[5]3.7	1.2–11.7
5/15/1985	4.8	[5]ND	0–10
7/1/1985	5.5	[5]ND	0–10
7/8/1985	5.5	[5]ND	0–10
7/23/1985	5.5	[5]ND	0–10
7/31/1985	5.5	[5]ND	0–10
8/19/1985	6.0	[5]ND	0–10
9/11/1985	6.0	[5]ND	0–10
9/17/1985	6.0	[5]ND	0–10
9/24/1985	6.0	[5]ND	0–10
10/29/1985	6.0	[5]ND	0–10
[2]TTWTP Tank STT-39			
2/11/1985	176	[5]215	0–10

[1]Weighted-average computation

[2]See Plate 1, Chapter A report, for location (Maslia et al. 2007)

[3]Detection limit is unknown

[4]Analysis of tap water sample for Tarawa Terrace, address unknown

[5]Detection limit = 10 µg/L

[6]Detection limit = 2 µg/L

[7]Sample collected downstream of TTWTP reservoir after operating well TT-23 for 24 hours

[8]Sample collected upstream of TTWTP reservoir after operating well TT-23 for 22 hours

Next, ATSDR set out to apply a more complex and more sophisticated approximation of transport in the subsurface by using a model that would degrade PCE into TCE, 1,2-tDCE, and VC. As PCE migrates in the subsurface it continues to undergo transformation through physical and biochemical processes such as volatilization and biodegradation. To quantify historical concentrations of PCE degradation by-products observed in groundwater samples reported in Faye and Green, Jr. (2007, Figures E1-E14) and in soil (vapor phase) requires a model capable of simulating multiphase flow and multispecies mass transport such as TechFlowMP (Jang and Aral 2008). ATSDR summarized the second and more complex modeling approach in Maslia et al. (2007, p. A41) and described the detailed development and application of the TechFlowMP model at Tarawa Terrace in Jang and Aral (2008). MT3DMS and TechFlowMP use two entirely different numerical schemes. MT3DMS uses a finite difference scheme to approximate the partial differential equations of saturated groundwater flow and contaminant fate and transport. TechFlowMP uses a Galerkin finite-element based approach with upstream weighting and mass lumping of the time derivative matrices to simulate multiphase flow and multispecies mass transport in the vadose zone and saturated zone.

To simulate groundwater flow conditions at TT, TechflowMP applied the calibrated hydraulic and aquifer properties from MODFLOW, reported in Maslia et al. (2007, Table A11). A correlation between geologic and hydrologic units and the MODFLOW/MTD3DMS and TechflowMP models is provided in Jang and Aral (Table G1), with the main difference between the two modeling approaches being that TechFlowMP has 5 layers assigned to the variably saturated zone. For predevelopment and transient groundwater flow, TechFLowMP applied the same initial and boundary conditions and pumping schedules used in MODFLOW reported in Faye and Valenzuela (2007). Comparisons of simulated groundwater heads between the TechFlowMP and MODFLOW-96 models show good agreement, and comparisons between the two modeling approaches are shown in Jang and Aral (2008, Figure G3) for model layers 1, 3, and 5 (main water-bearing units). Slight differences between groundwater-head simulations obtained using the two models were most likely due to the different numerical methods used by the two models to approximate the equations of groundwater flow. Recall that TechFlowMP uses a finite-element technique, whereas MODFLOW uses a finite-difference technique.

As discussed above, the TechFlowMP model uses a more complex approach for simulating fate and transport of biochemical processes such as volatilization and biodegradation taking place in the subsurface. Additional chemical and physical properties required by TechFLowMP for PCE and its degradation products (TCE, 1,2-tDCE, and VC) are listed in Jang and Aral (2008, Table G2). Other fate and transport properties used for the MT3DMS simulation are listed in Maslia et al. (2007, Table A11). For the source concentration (PCE) at ABC One-Hour Cleaners, MT3DMS applied a mass-loading rate of 1,200 g/d (calibrated) to the saturated zone (MODFLW/MT3DMS model Layer 1). At ABC One-Hour Cleaners the altitude of the source ranges from 0 to 13 ft, which implies that in TechFlowMP the source PCE was partially released into the unsaturated zone and partially released into the saturated zone.

PCE concentrations simulated by TechFlowMP are less than those using MT3DMS (Maslia et al. 2007, Appendix A2; Expert Report of M. Maslia (2024, Appendix H1). This is partially due to TechFlowMP simulating (1) the release of PCE from the subsurface (groundwater) to the atmosphere, (2) PCE partitioning from the water phase to the soil vapor phase, and (3) the

placement of the contaminant source at the ABC One-Hour Cleaners site in the unsaturated and saturated zones**.** The difference between MT3DMS and TechFlowMP in simulating PCE transport at Tarawa Terrace and vicinity is (1) TechFlowMP considers PCE in both water and gas phases while MT3DMS considers PCE only in the water phase and (2) in MT3DMS the source concentration is released solely to the saturated zone. In MT3DMS simulations (Faye 2008), there is no PCE transfer into the gas phase. In TechFlowMP simulations, however, because PCE could be present in the gas phase, a portion of PCE in the gas phase could be released from the subsurface into the atmosphere through the ground surface. This results in the reduction of PCE concentration in the subsurface. The differences in simulated PCE concentrations at Tarawa Terrrace were clearly and transparently presented by ATSDR in Appendix A2 (Maslia et al. 2007) and in the Expert Report of Maslia (2024, Appendix H1). In these appendices, column 3 represents the MODFLOW/MT3DMS simulation of PCE whereas column 4 represents the TechFlowMP simulation of PCE (the same simple mixing model was applied to both simulation methods to obtain PCE concentrations at the TTWTP).

Based on the explanations given above for simulated PCE differences between MODFLOW/MT3DMS and TechFlowMP, it is not clear, evident, or apparent what issue Spiliotopoulos (2024, p. 55) has with simulating different concentrations of PCE using the two different modeling methods. The simulated PCE concentrations using MODFLOW/MT3DMS and TechFlowMP must be different and the PCE concentrations simulated by TechFlowMP should be (and were) less than those simulated by MODFLOW/MT3DMS.

4.9 Additional Topics

Below I briefly respond to several additional topics raised in the Expert reports of AS (Spiliotopoulos 2024) and RH (Hennet 2024).

4.9.1 Benzene Contamination

RH posits in his Opinion 4 that the TTWTP was likely not contaminated with benzene (Hennet 2024, p. 5-22). I agree with that opinion because ATSDR analyses indicated that benzene was not detected or detected at trace levels at the TTWTP.

RH posits incorrectly in his Opinion 6 (Hennet 2024, p. 5-32) that the HPWTP was likely not contaminated with benzene. He bases this opinion on a flawed and erroneous assumption that water-supply well HP-602 was operated solely 39% of the time (frequency of use of 0.39). This is the same flawed reasoning that RH used for water-supply well HP-651and which I conclusively discredit (see Section 4.2.2.4 in my report).

Well HP-602's operational log demonstrates the well's long-term operation; even with short-term operation and repairs, it was kept as part of the group of operating wells, even though it was not a high-volume producing well (Sautner et al., 2013, p. S1.17).[32] The last three capacity tests for well HP-602, however, indicated capacities of 130 gpm (8/17/1983), 100 gpm (6/20/1984), and 154 gpm (10/24/1984).

[32] CLJA_WATERMODELING_05-0000826058.

RH's claim that benzene is a recent short-term event does not consider the expansive remediation effort that has taken place at the HPIA and HPFF (Faye et al. 2010, p. C26)[33] and the volumes of estimated benzene in the subsurface as discussed below.

Measured concentrations of benzene have been documented. HPHB Chapter C (Faye et al. 2013), Figure C34[34] shows substantial benzene concentrations from samples within the HPIA. Table C80 (Faye et al 2013)[35] shows substantive benzene concentrations at IRP Sites: 6 (32J μg/L), 22 (29,000 μg/L), 78 (HPIA, 5,500 μg/L), 84 (3,800 μg/L), and 94 (17,300 μg/L). In addition the model TechNAPLVol (Jang et al. 2013)[36] confirmed previous LNAPL (floating benzene) volumes using the SpillCAD™ model (Engineering Science & Technology 1993) and Order of Magnitude analysis (CH2M HILL 2001). Additionally, Faye et al. (2013, Table D10)[37] summarize BTEX contaminants at selected RCRA investigations sites and occurrences of BTEX in nearby supply wells for the HP-HB area—HP-608 (Buildings 1502 and 1601), and HP-602 (HPFF, Building 1115, and Michael Road Fuel Farm). Three samples at the HPWTP, collected after all contaminated water-supply wells had been removed from service show the following benzene concentrations: 11/19/1985 (2,500 μg/L), 12/10/1985 (38 μg/L), and 12/18/1985 (1.0 μg/L). These data in addition to the erroneous assumption of a 39% operational frequency for well HP-602 demonstrate the flaw in RH's logic and reasoning that the HPWTP was likely not contaminated with benzene.

4.9.2 Site-Specific Data

Both RH and AS posit that ATSDR did not consider site-specific data to parametrize models (RH Opinion #11, page 5-37). Their *only* example of this is ATSDR not using site-specific f_{oc} data, and that has been rebutted above in the section on Derivation and Computation of Sorption Parameter Values. ATSDR provided a long and comprehensive list of documents and data that it used for the historical reconstruction analysis (Maslia et al. 2013, Appendix A2)[38], whose title is "Information sources used to extract model-specific data for historical reconstruction analysis." Examples of the site-specific data sources include water-quality laboratory analyses by Granger laboratory, JTC environmental laboratories, the CERCLA Administrative Record files, solid waste management unit reports, installation restoration program site reports, as well as hundreds of consulting reports providing site-specific data (e.g., AH Environmental Consultants, Baker Environmental, CH2HILL). The claim by AS and RH that ATSDR did not use site-specific data is simply false.

4.9.3 Travel Time for PCE to Reach TT-26

RH posits that travel time to TT-26 is in the range of 15-25 years (RH 2024, p. 5-15, 5-16, 5-22, and his Attachment D). Konikow (2025) provides a detailed discussion and response to RH, with which I agree and provide below:

> "Dr. Hennet estimates a range of values for travel times of PCE between ABC Cleaners and TT-26 that are stated to be "in the 15 to 25 years range", based on three assumed

[33] CLJA_WATERMODELING_05-0000777129.
[34] CLJA_WATERMODELING_05-0000777170.
[35] CLJA_WATERMODELING_05-0000777384.
[36] CLJA_WATERMODELING_05-0001005553.
[37] CLJA_WATERMODELING_05-0001004009.
[38] CLJA_WATERMODELING_05-0000777681 – 05-0000777688.

"representative" flow paths, indicating the arrival didn't occur until the 1970s. He presents supporting material and calculations in his Attachment D. Dr. Hennet assumes the horizontal travel distance in the shallow aquifer is either (1) 200 ft in the shallow aquifer and 800 ft in the pumped aquifer, (2) 500 ft in the shallow aquifer and 500 ft in the pumped aquifer, or (3) 800 ft in the shallow aquifer and 200 ft in the pumped aquifer. He further assumes that the hydraulic gradient in the layer 2 confining unit is the same in all cases (i.e., at three different distances from the pumping well). This is not a reasonable assumption (for example, see TT Figs. C19 & C21). In the pumped aquifer, a cone of depression will form with lowest heads adjacent to the well and higher heads further from the well. In the shallow aquifer, the heads will not change much due to pumping in the deeper aquifer. This drawdown effect is strongest near the well, and results in a greater hydraulic gradient (and faster velocity) across the confining layer closer to the well.

Pumping also results in a steeper horizontal gradient (and faster velocity) closer to the well in model layer 3, and a shallower gradient further from the well. Dr. Hennet's calculations assume the same horizontal velocity in the pumped aquifer regardless of the distance from the pumped well, which is not a valid assumption.

Examining the heads for model layers 1 and 3 as shown in TT Figs. C18 and C19, and looking at a point about halfway between ABC Cleaners and TT-26 and at a point very close to TT-26, the head difference between the two layers (across the confining bed) is about 10' – 9' = 1 ft at the halfway location and about 5' – 2' = 3 ft at a location close to TT-26. Therefore, the hydraulic gradient potentially driving downward flow is about 3 times greater close to the well than it is halfway between the well and the contaminant source. So this large spatial change in vertical hydraulic gradient must be accounted for, and the assumption that it is the same at all locations cannot be supported. Dr. Hennet does not account for the steeper vertical gradient in layer 2 for the path closer to the pumped well, nor does he account for the faster velocity in layer 3 when the travel distance is only 200 ft.

It is more likely that the travel distance in the shallower aquifer for much of the contaminated shallow groundwater would be more than 800 ft and the corresponding travel distance in the pumped aquifer would be less than 200 ft because (1) the vertically downward transport is more likely to occur where the vertical gradient is the strongest in the confining layer, which is closest to the pumping well, (2) the downward velocity would be fastest where the gradient is steeper close to TT-26, and (3) according to Dr. Hennet's calculations, the downward flux is only about 5% of the horizontal flux in the shallow aquifer, so that even if some contaminant leaked downward at further upgradient distances from TT-26, much would remain in the shallow aquifer to migrate to locations closer to, or even adjacent to, TT-26, where downward leakage would be the fastest. Thus, Dr. Hennet's three "representative" flow paths did not include a more critical flow path in which travel in the shallower aquifer is close to 1,000 ft. For this critical flow path, the travel time would be much less than 15 years—on the order of 3.5 to 5 years. For these several reasons, Dr. Hennet's estimates of travel times from ABC to TT-26 are erroneous, misleading, biased-high, and based on unreliable assumptions." (Konikow 2025).

Based on my and Dr. Konikow's analysis, a summary of my response to RH is as follows:

- **Travel Time Estimates**: RH estimates a 15–25-year range for PCE travel time between ABC Cleaners and TT-26, but his calculations show a 14.9-19.7-year range.
- **Retardation Factor**: RH uses a retardation factor of 3.5, whereas the calibrated value for the TT model is 2.9, overestimating travel times by 20%.
- **Horizontal Travel Distance**: RH assumes horizontal travel distances of either 500 ft in both the shallow and pumped aquifers or 800 ft in the shallow aquifer and 200 ft in the pumped aquifer.
- **Hydraulic Gradient Assumptions**: RH incorrectly assumes consistent hydraulic gradients in layer 2's confining unit at both distances from the pumping well.
- **Cone of Depression**: In the pumped aquifer, a cone of depression forms with the lowest heads near the well and higher heads farther away.
- **Shallow Aquifer Heads**: Heads remain relatively unchanged in the shallow aquifer, affecting horizontal gradients.
- **Gradient Variation**: The hydraulic gradient near the well is three times greater than halfway between the well and the contaminant-source.
- **Gradient and Velocity**: RH does not account for the steeper vertical gradient closer to the pumped well or the higher velocity in layer 3 over a 200 ft travel distance.
- **Travel Distance Plausibility**: It's more likely that the travel distance in the shallow aquifer exceeds 800 ft, with a shorter distance in the pumped aquifer, due to the concentration of vertical downward transport and gradients near the pumping well.
- **Downward Flux**: RH's calculations indicate that downward flux is only about 5% of the horizontal flux in the shallow aquifer.
- **Misguided Assumptions**: RH's estimates are based on an overly simplistic and unreliable methodology.

4.9.4 Purpose of ATSDR Modeling

AS claims that the ATSDR models cannot be used for the purpose of estimating Plaintiffs' exposures because that was not the stated purpose of the model (Spiliotopoulos 2024, p. 18). This is a flawed rationale because the stated purpose of a model does not limit or determine the value and use of the model and its results.

ATSDR is a Public Health Agency. Therefore, reports reflect (and state) the ATSDR policy that analyses were not being conducted or extrapolated by ATSDR to individuals. This agency policy is not an indication or determination as to the applicability of the model and historical reconstruction results to individuals.

The methodology used by ATSDR was appropriate and reasonable to provide mean monthly contaminant concentrations in finished water. These model results may be used by health professionals for an epidemiology study and/or to estimate past exposures of residents on an "as likely as not" or "more likely than not" basis. The methods used were rigorous and scientifically sound. ATSDR appropriately told the public that "ATSDR's exposure estimates cannot be used *alone* to determine whether you, or your family, suffered any health effects as a result of past exposure to TCE-contaminated drinking water at USMCB Camp Lejeune." A determination of health effects requires interpretation of the exposure and dose data by a health professional.

5.0 Summary and Conclusions

I have provided detailed responses to eight topical areas addressed in DOJ's Expert Reports (Brigham 2024, Hennet 2024, Spiliotopoulos 2024). None of the opinions found in the DOJ Expert Reports would substantively or even moderately change any of the conclusions from ATSDR's historical reconstruction and water-modeling analyses reported in Maslia et al. (2007, 2013, and other supporting reports and documents), or the opinions in my October 2024 expert report. In summary, in response to DOJ's expert reports, I offer the following opinions and conclusions within reasonable scientific certainty:

- ATSDR calibrated its models using a four-stage, hierarchical calibration process. Results of the model-calibration process indicated excellent model and observed data comparisons in finished water at the WTPs, which resulted in geometric model biases of solely 1.5 (TTWTP) and 2.3 (HPWTP). This provides confidence that model behavior (i.e., results) for all four calibration stages provide reasonable accuracy and concordance with system behavior. Neither RH (2024) nor AS (2024) address the merits of the four-stage calibration process in their reports.

- AS (2024) repeatedly accuses ATSDR of making "arbitrary" assumptions and of not basing parameter values on site-specific data. Neither accusation has merit. For example, AS (2024) takes the position that adjusting a model parameter value (e.g., mass loading) to fit water quality data, which are of course site-specific data, is an "arbitrary" decision. (For example, AS Report, pages 78-79.) This is not true. Making such an adjustment is an accepted and best-practices part of the methodology of model calibration. As another example, AS asserts (at page 84) that the use of a U.S. EPA study (USEPA 1986, 1987) of 12,444 leak incident reports to estimate the timing of UST releases at Hadnot Point is "arbitrary and uncertain." Again, this is not true. Reliance upon such a comprehensive study is an accepted methodology; it is not "arbitrary." In summary, ATSDR based parameter values on the best data it had available, including site-specific and published data. ATSDR also made appropriate adjustments to parameters to fit site-specific conditions.

- It is precisely because there was limited data prior to 1980 that ATSDR applied the historical reconstruction process, which included information gathering, data analyses, and model simulation to reconstruct historical concentrations of finished water delivered to the residents of Camp Lejeune. Models play an important role in providing insight and information when data are missing, insufficient, or unavailable. Historical reconstruction has been utilized since the 1930s, is a widely accepted analysis method, and has been applied to other high-profile public sites (Konikow 1977, Konikow and Thompson 1984, Rogers 1992, NRC, 1996). This method has also been reviewed extensively by Samhel et al. (2010) and others.

- Owing to the four-stage, hierarchical calibration process that ATSDR used in calibrating its models, the presentations in Tarawa Terrace Chapter A (Maslia et al. 2007) and Chapter F (Faye 2008) reports comparing computed and observed PCE concentrations at the TTWTP

comprise a major part of TT model calibration. Such comparisons indicate that, regardless of simulated concentrations at individual supply wells, the calibrated Tarawa Terrace MT3DMS model delivered a reasonably accurate total PCE mass to the TTWTP during the 1980's.

- ATSDR applied models that have been tested and verified, and that are available in the public domain, as part of its historical reconstruction process for Camp Lejeune. These models approximate the physics of groundwater flow and chemical transport and are not "professional judgment." Professional judgment and experience were used when selecting values for model parameters, but those values were based on both field and literature sources and were adjusted over reasonable ranges during calibration to best replicate the observed data, which is the generally accepted methodology in the hydrogeology and modeling fields.

- Selecting model parameters based on professional judgment is a normal, standard, and accepted practice. Data are always limited, requiring professional judgment to determine how to handle this paucity of data and how much weight to assign to the limited number of measurements. Groundwater modelers always wish for more data, but the reality is that there is never enough data available to avoid relying on professional judgment.

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Appendix A — Volatilization Issues: Excerpts From the ATSDR Expert Panel Meetings of March 28, 2005 and April 30, 2009

2005-03-28 Panel Meeting Transcript at 55:2-57:14

Panel members Thomas Walski and Peter Pommerenk (AH Environmental consultant) respond to a question from Dr. James Uber to Morris Maslia about whether there are any potential chemical biological processes taking place in the distribution system.

Dr. Thomas Walksi, 55:2-56:1: "To give you a little answer to your question, Jim, on the processes, most of the things that happen to the VOCs in pipes don't really -- I mean, there's not much that can happen to them. I mean, in pipes, the only place where you could have much of a process affecting them is usually in tanks where you have a free water surface and they can volatize. But when Ben and I did the work in Phoenix/Scottsdale, we looked at that, then went back to Henry's Law and looked at stuff like that. And we did -- you know, since you don't really -- it's hard to measure these kind of things, and there's not a lot of literature on Henry's Law in a perfectly still tank. Usually, if it's for stripping towers and stuff like that, you have a lot of literature data.

But going back and trying to reconstruct this, we estimated 97 percent of what went into a tank came out. Very little is really lost through the surface, and that's about the only process that you lose VOCs is through the surface of the tank. So basically, assuming that it's -- what goes in the system goes to the tap is probably, you know, a reasonable assumption if there's not processes occurring. At least, we couldn't figure out any processes that would knock down the concentration significantly."

Dr. Pommerenk, 56:2-57:14: "Yeah. I have some supporting information on that. Because that question was asked by Camp Lejeune to us as their consultants, we looked into literature and tried to come up with a rough estimate of would there be any removal within the treatment plant. And since, you know, we had to review all of the drawings of the existing plants, we knew the surface areas that are available. We made certain assumptions: You know, is the water quiescent in that tank, or, you know, is there any agitation anywhere?
In all the tanks that we looked in -- and some of the tanks are newer. There's more surface area available today than there used to be early in the seventies. But removal due to volatilization was negligible. I mean, it was less than a tenth of percent. The only location where there would be some removal was in the spiractors that were operated in all these Hadnot Point, Holcomb Boulevard, and Tarawa Terrace plants. And even there, there was a certain uncertainty, depending on they had conditions downstream you would get some agitation at the effluent pipe. So although we said it's probably negligible, and I agree with Tom's number here. At 90 percent, what's going in is coming out on the other end."

2009-04-30 Panel Meeting Transcript

Dr. Pommerenk, 178:18-181:19: " . . .there's a big five treatment plant in between, between the groundwater collection system and the distribution system.

It consists -- and correct me if I'm wrong -- of a [ground storage –ed.] tank. I don't remember what the size is, but it's probably a million gallon or larger. The Hadnot Point plant has a pump station that pumps water from that water collection tank into what are called catalytic softening units or [spiractor –ed.] cones to which [lime –ed.] is injected to facilitate softening and it overflows into a central pipe.

It goes from there through a rectangular basin that used to be a re-carbonation base, and I'll get back to that. And from there into gravity filters and you know after chlorination and fluorination into a finished water clear well.

Obviously, in this facility there's several quiescent or not so quiescent surfaces from which volatile –ed.] organic compounds can escape. And that kind of depends on the physical properties of these compounds, PCE more so than TCE and so on. We made an estimate a few years ago, a rough estimate, that probably PCE and TCE, we didn't look at BTEX, removal would be incidental, minor, probably. The tanks are covered so there's no way effluents could stir up things.

However, what was not looked at that was, because of lack of information is the re- carbonation basin. The re-carbonation basin serves to, it's typically a small, flow-though basin to which you inject carbon dioxide that is generated from a propane generator or from gas bottles. And carbon dioxide is an [acid –ed.] in water and [decreases –ed.] the pH which has been pretty high prior to, because of lime addition.

So that's how this whole softening process works. You bring the pH up you're still going to have calcium carbonate. Bring the pH back down within the allowable limits. So as far as I know, and as far as I can recall, I've never seen this basin in operation. It was just water flowing through. However, it was put in for a purpose originally some time in the '40s, and nobody can tell me exactly if it ever has been operated and how long it has been operated. Because if it has been operated, it could have [caused –ed.] substantial removal of PCE and TCE. It would have been in the 90 percent removal.

And it kind of depends on the gas flow rates. It kind of depends on the turbulence that got generated. So there's a variety of factors that would have presented. But it could have affected removal of these compounds in the plant. And again, we just looked at PCE and TCE as from volatilization from the basins that are there, not [re-carbonation –ed.] because we didn't have any additional information.

But it might be worth looking into BTEX volatilization from the basins, you know, whether that as a source is uncertainty again. And I'm not trying to get exact numbers or anything, but it's another source of uncertainty for the exposure calculations for what could potentially be the removal of these compounds from the plant, A. And B, finding out whether this has ever been online, this re-carbonization basin